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4 IN PRO PER



5  
6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA,**  
8 **WESTERN DIVISION**

9 TODD R. G. HILL, pro se, ) Case No.: 2:23-cv-01298-JLS-BFM

10 Plaintiff(s), ) **The Hon. Josephine L. Staton**  
11 vs. ) Courtroom 8A, 8th Floor

12 ) **Magistrate Judge Brianna Fuller Mircheff**  
13 THE BOARD OF DIRECTORS, OFFICERS ) Courtroom 780, 7th Floor  
14 AND AGENTS AND INDIVIDUALS OF THE )  
PEOPLES COLLEGE OF LAW; THE GUILD )  
LAW SCHOOL, a CALIFORNIA )  
CORPORATION doing business as THE )  
PEOPLES COLLEGE OF LAW; CHRISTINA )  
MARIN GONZALEZ, ESQ.; HECTOR C. )  
PENA; ROBERT IRA SPIRO, ESQ.; JUAN )  
MANUEL SARINANA, ESQ.; PREM SARIN; )  
DAVID TYLER BOUFFARD; JOSHUA )  
GILLENS, ESQ.; CLEMENTE FRANCO, )  
ESQ.; HECTOR SANCHEZ; PASCUAL )  
TORRES, ESQ.; CAROL DEUPREE; GARY )  
SILBIGER, ESQ.; EDITH POMPOSO; )  
ADRIANA ZUNIGA NUNEZ; ROGER )  
ARAMAYO; WILLIAM MAESTAS, ESQ.; )  
ISMAEL VENEGAS )

23 Defendant(s). )  
24 \_\_\_\_\_

25 ) **DEMAND FOR JURY TRIAL**  
26 ) **Unlimited Civil Case**  
27 ) **FOURTH AMENDED COMPLAINT FOR**  
28 ) **DAMAGES, DECLARATORY &**  
THE ) **INJUNCTIVE RELIEF ARISING FROM:**

- I. CIVIL RICO CLAIM - DAMAGES  
UNDER THE RACKETEER INFLUENCED  
AND CORRUPT ORGANIZATIONS ACT  
(18 U.S.C. § 1961 et seq.)
- II. VIOLATION OF THE UNRUH CIVIL  
RIGHTS ACT (CALIFORNIA CIVIL CODE  
§ 51) DISCRIMINATORY CONDUCT  
AND DAMAGES
- III. NEGLIGENCE AND NEGLIGENCE  
PER SE - BREACH OF DUTY  
RESULTING IN HARM
- IV. NEGLIGENT HIRING, RETENTION,  
AND SUPERVISION - FAILURE TO  
IMPLEMENT PROPER SAFEGUARDS

1 **TABLE OF CONTENTS**

2	I.	IDENTIFICATION OF PARTIES .....	- 3 -
3	II.	BASIS FOR JURISDICTION AND VENUE.....	- 5 -
4	III.	TERMINOLOGY AND DEFINITIONS.....	- 6 -
5	IV.	STATE BAR REGULATORY POSTURE LIMITED STUDENT RE COURSE.....	- 6 -
6	V.	PCL'S PERSISTENT NON-COMPLIANCE AND EXPLOITATIVE PRACTICES .....	- 7 -
7	VI.	OBSTRUCTION OF PLAINTIFF'S ACADEMIC PROGRESS THROUGH RECORD MANIPULATION.....	- 14 -
8	VII.	STATE BAR'S FAILURE TO ENFORCE COMPLIANCE DESPITE AWARENESS OF VIOLATIONS .....	- 15 -
9	VIII.	FRAUDULENT REPRESENTATIONS AND MANIPULATION OF STUDENT RECORDS-	16 -
10	IX.	FAILURE TO DISCLOSE NON-COMPLIANCE AND MISLEADING REPRESENTATION OF ACCREDITATION .....	- 17 -
11	– FIRST CAUSE OF ACTION – .....		- 18 -
12	RICO CLAIM: DAMAGES UNDER THE VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT .....		- 18 -
13	– SECOND CAUSE OF ACTION – .....		- 40 -
14	CLAIM FOR VIOLATION OF THE UNRUH CIVIL RIGHTS ACT .....		- 40 -
15	– THIRD CAUSE OF ACTION – .....		- 45 -
16	CLAIM FOR NEGLIGENCE AND NEGLIGENCE PER SE .....		- 45 -
17	– FOURTH CAUSE OF ACTION – .....		- 58 -
18	CLAIM FOR NEGLIGENT HIRING, RETENTION, AND SUPERVISION.....		- 58 -
19	REMEDIES & RELIEF REQUESTED .....		- 60 -
20	A.	Monetary Relief.....	- 61 -
21	B.	Declaratory Relief .....	- 61 -
22	C.	Injunctive Relief.....	- 61 -
23	D.	Other Relief .....	- 62 -
24	E.	Additional Remedies .....	- 62 -
25	Plaintiff's Proof of Service.....		- 64 -
26	Affidavit of Todd R. G. Hill in Support of the Fourth Amended Complaint.....		- 65 -
27	TABLE OF EXHIBITS .....		- 70 -
28	<b>Cases</b>		
29	<i>Bridge v. Phoenix Bond &amp; Indem. Co.</i> , 553 U.S. 639, 654 (2008).....		- 35 -
30	<i>Byrne v. Boadle</i> , 2 H. & C. 722, 159 Eng. Rep. 299 (Ex. Ch. 1863).....		- 49 -
31	<i>Rotella v. Wood</i> , 528 U.S. 549, 561 (2000) .....		- 35 -
32	<i>Schmuck v. United States</i> , 489 U.S. 705, 711 (1989) .....		- 30 -
33	<i>Ybarra v. Spangard</i> , 25 Cal. 2d 486, 154 P.2d 687 (Cal. 1944) .....		- 49 -

1                   **I. IDENTIFICATION OF PARTIES**

2                   1. **PLAINTIFF.** Plaintiff Todd R.G. Hill (“Plaintiff” or “Todd”) is an African American adult  
3                   residing in Belton, Texas with an ADA-recognized disability.  
4

5                   2. **DEFENDANTS:**

- 6                   3. Peoples College of Law (“PCL”) was the dba of the Guild Law School, a non-profit  
7                   corporation. PCL operated as an unaccredited fixed-facility law school in Los Angeles,  
8                   California, subject to regulation by the State Bar of California. PCL offered legal education  
9                   services to in-state and out-of-state students via the Internet until its charter was revoked for  
10                  protracted non-compliance effective May 31, 2024.  
11
- 12                  4. Christina Marin Gonzalez, Esq. (“Gonzalez”) was the President of PCL and is a PCL  
13                  graduate.  
14                  5. Hector C. Pena (“Pena”) is a PCL graduate and has served as President and Board Treasurer.  
15                  6. Robert Ira Spiro, Esq. (“Spiro”) was the Dean of PCL and has served in various roles,  
16                  including corporate counsel.  
17                  7. Juan Manuel Sarinana, Esq. (“Sarinana”) was an adjunct professor and Dean of PCL.  
18                  8. Prem Sarin (“Sarin”) based on personal experience and credible report is an individual and  
19                  PCL graduate who has served as a PCL Board Member from November 2021 and times  
20                  relevant to this matter.  
21
- 22                  9. David Tyler Bouffard (“Bouffard”) based on information and belief has served as a PCL  
23                  Board Member from November 2021 and times relevant to this matter.  
24
- 25                  10. Joshua Gillens, Esq. (“Gillins”) based on information and belief is an individual and PCL  
26                  graduate who has served as a PCL Board Member from November 2021 to and times  
27                  relevant to this matter.  
28

- 1 11. Clemente Franco, Esq. (“Franco”) based on information and belief has served as a PCL  
2 Board Member from November 2021 to the present and as Treasurer.  
3 12. Hector Sanchez (“Sanchez”) based on information and belief has past served as a PCL  
4 Board Member and has engaged in conduct relevant here from November 2021 and times  
5 relevant to this matter.  
6 13. Pascual Torres, Esq. (“Torres”) based on credible report is an individual associated with PCL  
7 having served as Dean of the law school for a brief tenure in 2022.  
8 14. Carol Deupree (“Deupree”) based on experience and credible report has served as a PCL  
9 Board Member from November 2021 and times relevant to this matter.  
10 15. Gary Silbiger, Esq. (“Silberger”) based on information and belief is a co-founder of PCL  
11 who has served as a Board Member at various times from 2018 to the present.  
12 16. Edith Pomposo, (“Pomposo”) is an individual associated with PCL. Pomposo served as  
13 Dean of the law school in 2022.  
14 17. Adriana Zuniga Nunez (Zuniga) is an individual associated with PCL in her former capacity  
15 as PCL's paid Registrar.  
16 18. Roger Aramayo (“Aramayo”) is an individual associated with PCL in his capacity as PCL's  
17 paid Registrar in 2023.  
18 19. William Maestas, Esq. (“Maestas”) based on information and belief is a co-founder and  
20 graduate of PCL. Maestas has served as a Board Member at various times from at least 2018  
21 to the present.  
22 20. Ismael Venegas (“Venegas”) is an individual associated with PCL in his capacity as PCL's  
23 Treasurer based on personal experience and credible evidence.  
24  
25  
26  
27  
28

1           **21. STATE BAR, OFFICIALS AND REGULATORY AGENTS:**

2           22. The State Bar of California is a public corporation and state regulatory agency under the  
3           jurisdiction of the California Supreme Court, with responsibilities to regulate the practice of  
4           law in California and to protect the public by ensuring that attorneys comply with the state's  
5           ethical standards. The State Bar, acting as an administrative arm of the state, is responsible  
6           for regulating legal education, accrediting law schools, and overseeing the legal profession  
7           in California. The following are current or former employees or affiliates of the State Bar of  
8           California ("State Bar") named as Defendants in their individual capacities:

9  
10          23. Natalie Leonard ("Leonard") is an active licensee and Principal Program Analyst at the State  
11           Bar of California, responsible for law school regulation and was the primary contact for PCL  
12           compliance issues.

13  
14          24. Leah Wilson, Esq. ("Wilson") is an active licensee and individual employed as the Executive  
15           Director of the State Bar.

16  
17          25. Audrey Ching ("Ching") is an active licensee and Director of the Office of Admissions of  
18           the State Bar and is responsible for law school regulation and staff oversight.

19           **II. BASIS FOR JURISDICTION AND VENUE**

20          26. This action arises under the Racketeer Influenced and Corrupt Organizations Act (RICO), 18  
21           U.S.C. §§ 1961-1968, and supplemental jurisdiction is invoked over related state-law claims  
22           pursuant to 28 U.S.C. § 1337.

23          27. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question  
24           jurisdiction) and 28 U.S.C. § 1337 (supplemental jurisdiction). Additionally, jurisdiction is  
25           proper under 28 U.S.C. § 1332 (diversity jurisdiction) because Plaintiff Todd Hill is  
26           currently a resident and citizen of the State of Texas, while Defendants predominantly reside

1 and conduct business within the State of California, creating complete diversity among the  
2 parties.

3 28. Venue is proper in this Court pursuant to 28 U.S.C. § 1331(b) because many of the events or  
4 omissions giving rise to the claims occurred in this District, and the Defendants are  
5 predominantly located within this judicial district.  
6

7 **III. TERMINOLOGY AND DEFINITIONS**

8 29. "The Board of Directors" refers to the governing body of the Peoples College of Law,  
9 responsible for overall management and strategic direction.  
10

11 30. "Officers" refers to individuals holding executive positions within the institution, including  
12 roles such as President, Dean, and other senior administrators.  
13

14 31. "Agents of the Peoples College of Law" encompasses individuals or entities acting on behalf  
15 of or under the institution's authority, including faculty, staff, and contractors.  
16

17 **IV. STATE BAR REGULATORY POSTURE LIMITED STUDENT  
RE COURSE**

18 32. **State Action and Role Under Color of Law:** At all times relevant to this action, the **State**  
19 **Bar of California** was acting under color of state law. As a state entity, its employees,  
20 agents, and officers—acting in their official and personal capacities—participated in  
21 decisions and actions that directly affected Plaintiff's legal education and career progression.  
22

23 33. The State Bar of California operates under a "non-interference" policy in student disputes  
24 with law schools, as outlined in Guideline 1.6 of the Guidelines for Unaccredited Law  
25 School Rules (GULSR). As early as December 10, 2021, the State Bar communicated its  
26 'non-interference' policy to Todd, stating that it did not intervene in disputes between  
27 students and their law schools.  
28

1           **V. PCL'S PERSISTENT NON-COMPLIANCE AND EXPLOITATIVE**  
2           **PRACTICES**

3           34. PCL was the owner of the property located at 660 N. Bonnie Brae in Los Angeles, CA, held  
4           in fee simple absolute ownership and full control over the premises, as confirmed by  
5           property records for all times relevant to this cause of action.

6           35. From at least 2017, PCL has been engaged in a pattern of non-compliance with State Bar  
7           regulations related to record-keeping, grading, attendance policies, and scholastic standards.  
8           This pattern was documented during the January 2020 inspection conducted by Heather  
9           Georgakis, Educational Standards Consultant to the Committee of Bar Examiners (CBE),  
10           which identified numerous deficiencies including PCL's failure to accurately maintain  
11           student attendance records, reliance on unauthorized grading practices, and inadequate  
12           measures to ensure the integrity of student work. The inspection also revealed PCL's lack of  
13           sufficient administrative capacity to achieve compliance with CBE standards due to  
14           inconsistent record-keeping and inadequate policies for grade review and advancement.

15           36. PCL collected tuition from students, including Plaintiff, without compensating instructors,  
16           who were induced to provide their services under representations that their efforts would  
17           support a social justice-oriented, non-profit law school. Despite this representation, PCL  
18           actively recruited students from underrepresented communities, targeting individuals from  
19           disadvantaged backgrounds with limited access to legal services. The school's marketing,  
20           including statements on its website, emphasized advocacy for marginalized groups, while  
21           concurrently failing to address the institutional deficiencies identified by the CBE inspection  
22           and other grievances submitted by students.

23           37. After Plaintiff successfully passed the First-Year Law Students' Examination (FYLSX) in  
24           June 2020, he received transcripts from PCL that contained numerous errors, including  
25

1 incorrectly calculated class unit awards and missing required information. Despite Plaintiff's  
2 repeated efforts to rectify these errors and ensure compliance with State Bar regulations, his  
3 efforts were obstructed by Defendants Gonzalez, Pena, Spiro, and Leonard. On July 8, 2022,  
4 despite Plaintiff's good academic standing, Defendant Spiro, on behalf of PCL, informed  
5 Plaintiff that PCL would not provide the required fourth-year courses necessary for him to  
6 graduate. The delay in Plaintiff's education occurred while PCL continued to solicit tuition  
7 payments and present itself as compliant with State Bar standards.

8 38. PCL's adherence to a non-compliance policy that discouraged student grievances from  
9 reaching external regulatory bodies is further demonstrated by its administration's  
10 introduction of retroactive rules aimed at students who attempted to file complaints. Todd  
11 Hill received an email from student Kevin Clinton on March 21, 2022, indicating ongoing  
12 issues with grade uploads and administration's refusal to rectify transcript errors.  
13 Additionally, proposed PCL Student Handbook provisions discouraged or prohibited  
14 students from directly contacting the State Bar with complaints, instead funneling concerns  
15 through internal channels. This policy change was intended to silence student grievances and  
16 prevent external regulatory scrutiny. (See Exhibit 4 - Email Exchange from Kevin Clinton  
17 Indicating Grade Upload Issues, March 21, 2022).

18 39. PCL continued to operate despite documented grievances and inspection reports detailing its  
19 persistent non-compliance with State Bar regulations. The school's practices, including the  
20 solicitation of tuition payments while failing to comply with mandated record-keeping,  
21 grading standards, and administrative policies, reflect ongoing disregard for established  
22 regulations. PCL administrators, including Defendants Spiro, Pena, and Bouffard, engaged  
23 in improper financial practices by making repeated and unlawful tuition demands, as  
24 evidenced by emails related to tuition charges and collections dated March 2022. For  
25  
26  
27  
28

1 example, Defendant Bouffard demanded payment for tuition despite Plaintiff's pre-existing  
2 financial agreements allowing credits against tuition charges and State Bar policies  
3 prohibiting fee collection from non-compliant institutions. These communications  
4 demonstrate an ongoing pattern of fraudulent billing and coercive tactics aimed at extracting  
5 tuition payments from students. (See Exhibit 5 - March 2022 Email Related to Unlawful  
6 Tuition Charges and Collection).

7  
8 40. Despite PCL's long-standing non-compliance, the school expanded its class size without  
9 addressing existing deficiencies, exacerbating disparities in academic support and  
10 administrative oversight. PCL's recruitment of out-of-state students attending remotely,  
11 failure to provide proper and timely disclosures, maintenance of inaccurate records, and  
12 misrepresentation of its compliance status all contributed to a cycle of failure  
13 disproportionately affecting African American students. PCL's failure to comply with Rule  
14 2.3(D) and Rule 9.1 regarding oversight of record-keeping processes directly impacted  
15 Plaintiff's ability to transfer or receive accurate transcripts, thereby obstructing his  
16 educational progress.

17  
18 41. PCL's failure to provide necessary academic resources, maintain accurate records, and  
19 ensure compliance with educational standards disproportionately harmed African American  
20 students. The school's attrition rate for African Americans exceeded 90% since at least 2017,  
21 with fewer than 1 in 10 entrants ultimately receiving a degree. This was exacerbated by  
22 PCL's decision to expand enrollment without addressing existing compliance deficiencies.

23  
24 42. Based on State Bar and PCL documents, as early as 2017 and unbeknownst to Plaintiff at  
25 time of matriculation PCL's failure to timely report, provide or maintain accurate records  
26 resulted in ongoing non-compliance with State Bar rules and guidelines. (See Exhibit 5).

43. In the Fall of 2019, Plaintiff enrolled at PCL, an unaccredited fixed-facility law school in Los Angeles, California with the goals of earning a Juris Doctorate, preparing to sit for the bar exam and embarking on a new career.

44. Plaintiff paid application fees and tuition through checks, ACH bank or wire transfers or through money transfer services such as Zelle.

45. On credible report and belief, Todd was one of five African Americans in his 1L class; two males and three females, in a cohort of 22.

46. The State Bar Act of 1927 established the State Bar's regulatory authority and scope of its duties. The State Bar Act is codified in the California Business & Professions Code Div. 3 - Professions and Vocations Generally, Ch. 4 - Attorneys (Bus. & Prof. Code 6000 et seq.). The plaintiff believes on credible report that the State Bar rules and guidelines are regulations for purposes of Government Code 11342.600 and govern the operation of unaccredited law schools.

47. State Bar conducted an inspection of PCL in January of 2020.

48. The 2020 Inspection Report, prepared by Heather Georgakis, Educational Standards Consultant to the Committee of Bar Examiners (CBE), outlined numerous areas of non-compliance by Peoples College of Law (PCL) with the Unaccredited Law School Rules. Conducted from January 14–16, 2020, the inspection identified deficiencies related to recordkeeping, scholastic standards, attendance policies, and grading procedures. Among other issues, the report noted the failure of PCL to accurately maintain student attendance records, reliance on unauthorized grading practices, and inadequate measures to ensure the integrity of student work. Additionally, the inspection revealed PCL's lack of sufficient administrative capacity to achieve compliance with CBE standards, as evidenced by inconsistent record-keeping and inadequate policies for grade review and advancement.

1       Despite efforts by PCL to remedy some issues, the report underscores the persistent  
2       challenges facing the institution, particularly in maintaining accurate records, ensuring  
3       compliance with state regulations, addressing academic administrative deficiencies and  
4       meeting basic regulatory requirements.

5       49. Plaintiff was subsequently elected to serve on the Community Board and served as Secretary  
6       of the College.

8       50. In June 2020, Plaintiff was one of two PCL students, and the only African American in his  
9       cohort, to successfully pass the First-Year Law Students' Examination (FYLSX).

10      51. After passing the FYLSX, Plaintiff received copies of his transcripts, which contained  
11       numerous errors, including incorrectly calculated class unit awards and missing required  
12       information.

13      52. On May 7, 2021, PCL's Board, including Dean Ira Spiro and Board President Christina  
14       Gonzalez, holds a fundraiser, promising that "100% of proceeds" will be used for student  
15       needs. However, subsequent internal communications reveal that funds were diverted for  
16       unrelated purposes. (See Exhibit 8 email exchange between Spiro, Pena and Gonzalez,  
17       detailing the "Donor Call Squad" and fundraising-related activities.)

19      53. In June 2021, a formal grievance was submitted to the PCL Board of Directors by a first-  
20       year law student (1L), Nancy Popp.

22      54. The grievance detailed concerns about the school's operations, including inaccurate grading,  
23       lack of transparency in governance, and inconsistent instruction. It also highlighted failures  
24       to comply with the California State Bar's Guidelines for Unaccredited Law Schools.

25      55. This grievance letter was shared with the State Bar as part of its ongoing review of PCL's  
26       compliance.

56. On August 2, 2021, Spiro sends an email to the PCL Board stating the State Bar instructed him not to retroactively change unit allocations on transcripts without CBE approval.
57. On August 3, 2021, Spiro emails Leonard confirming their conversation about PCL's unit-credit issue. Leonard does not issue a school-wide clarification.
58. Plaintiff requested immediate assistance from the State Bar, as student and officer of PCL, in reliance on their statutory mandate, status as monopoly regulator and public DEI statements.
59. October 4–15, 2021, Plaintiff is elected to the PCL Board through a community vote. Peña challenges the legitimacy of Hill's candidacy, initiating a questionable review process.
60. **Retaliatory Governance Actions and Institutional Mismanagement:** On November 14, 2021, Christina Gonzalez, President of the PCL Board of Directors, submitted her resignation letter, attributing her resignation to discord allegedly caused by Plaintiff Todd Hill. Gonzalez's letter reflects internal animus and efforts by PCL's leadership to marginalize Plaintiff's influence within the institution. This letter is attached as part of Exhibit 8.

**61. Notice of Board Meeting and Governance Manipulation:** On November 21, 2021, Christina Gonzalez sent an email titled “PCL Notice - Board Meeting November 21, 2021” announcing a PCL Board meeting. This email was sent just days after her resignation letter, evidencing continued institutional discord and an attempt to reassert control over PCL’s governance structure in response to Plaintiff’s advocacy efforts. This email, along with the attached resignation letter, further demonstrates a pattern of retaliatory conduct aimed at undermining Plaintiff’s ability to participate meaningfully in PCL’s governance. This email is attached as part of Exhibit 8.

**62. Blocking Access to Class (March 15, 2022):** On March 15, 2022, PCL student and purported board member Sarin, acting under the direction of Bouffard, who claimed to be

1 acting under the authority of then PCL President Peña, actively prevented Plaintiff from  
2 accessing his classes by blocking his Zoom access. This action occurred following a series  
3 of emails regarding tuition disputes and class access issues. (See Exhibit 8 - Emails related  
4 to class access and tuition disputes dated March 10, 2022, and March 14, 2022.).  
5

63. **Failure to Provide Required Fourth-Year Curriculum:** On June 7, 2022, Todd Hill  
6 formally notified PCL, via email to Dean Spiro and the Board, that the school was failing to  
7 provide the mandated fourth-year (4L) curriculum of 270 instructional hours necessary for  
8 his graduation. PCL's failure to comply with its promises caused delays in Hill's academic  
9 progress.  
10

11 64. On July 8, 2022, despite Plaintiff's good academic standing, Spiro, on behalf of PCL,  
12 emailed Plaintiff to inform him that PCL would not provide the required fourth-year courses  
13 necessary for him to graduate.  
14

15 65. On July 20, 2022, the State Bar issued a formal Notice of Noncompliance to PCL, detailing  
16 18 specific violations of the Rules for Unaccredited Law Schools.  
17

66. On August 31, 2022, PCL belatedly submitted an application for Plaintiff's Special  
18 Circumstance Exemption to the State Bar. However, Dean Spiro intentionally withheld  
19 Plaintiff's medical disability records and information related to PCL's alleged misconduct,  
20 despite Plaintiff having provided information for the purpose of supporting his petition. This  
21 act of concealment resulted in the denial of the application, thus exacerbating the injury to  
22 Plaintiff.  
23

24 67. On September 1, 2022, Natalie Leonard of the State Bar formally denied Plaintiff's Special  
25 Circumstance Exemption request, citing insufficient documentation. Leonard's response did  
26 not consider Plaintiff's disability or the misconduct of PCL and Spiro in failing to submit the  
27 necessary materials.  
28

68. In December 2022, The Committee of Bar Examiners (CBE) places PCL on probation, requiring monthly reports on compliance improvements.
69. In December 2022, Plaintiff filed a Government Claims Act Form (“GCAF”) obtained from the State Bar’s web site with copies of a draft complaint. No response was received.
70. On March 22, 2023, a letter from PCL Dean Pomposo acknowledging PCL’s violation of Rule 4.241 promised refunds to affected students, but failing to follow through.
71. PCL’s Ultimate Closure Due to Non-Compliance: On May 31, 2024, PCL’s charter to operate as a law school was permanently revoked due to longstanding and intractable noncompliance. PCL was forced to shut down. While this validated Hill’s allegations about PCL’s unfitness, it caused significant personal harm, as his alma mater ceased to exist, complicating his ability to obtain his degree or finalize his education.
72. On August 13, 2024, Plaintiff submitted an additional GCAF for which response was received September 6, 2024, for damages related to this complaint.
73. On August 18, 2023, The Committee of Bar Examiners directs PCL to conduct a comprehensive transcript analysis and provide proof of compliance.

## **VI. OBSTRUCTION OF PLAINTIFF'S ACADEMIC PROGRESS THROUGH RECORD MANIPULATION**

74. Plaintiff registered with the State Bar as a student, paid the requisite state administration fees, and excelled in his studies, maintaining good academic standing throughout his enrollment.
75. After passing the FYLSX, Plaintiff received copies of transcripts with many errors, including incorrectly calculated class unit awards and missing required information. Plaintiff promptly informed defendants of these errors and sought to rectify them to ensure compliance with statute and State Bar regulations, but his efforts were consistently

1           obstructed by Defendants Gonzalez, Pena, Spiro, and Leonard. A true and accurate copy of  
2           relevant transcripts and accompanying correspondence are attached as Exhibit 1.

76. Defendant Spiro, acting on behalf of PCL, knowingly engaged in misrepresentations regarding Plaintiff's tuition payments and credit arrangements. Specifically, on January 9, 2020, Defendant Spiro approved Plaintiff to work up to 40 hours at \$15 per hour from January 4 to January 13, with a maximum gross pay of \$600. Defendant Spiro indicated that Plaintiff could credit this amount against his tuition but required Plaintiff to provide written approval for such an arrangement.

77. Despite Plaintiff's compliance, subsequent email exchanges revealed inconsistencies in Defendant Spiro's accounting, ultimately resulting in Plaintiff being overcharged by approximately \$2,400. Plaintiff's efforts to clarify these discrepancies were met with further obstruction.

78. On July 8, 2022, despite Plaintiff's good academic standing, Spiro, on behalf of PCL, emailed Plaintiff to inform him that PCL would not provide the required fourth-year courses necessary for him to graduate. Todds originally expected graduation date of May 2023 is now delayed until May 2025, a two-year delay. From 2019 until now, as of the filing of this Fourth Amended Complaint, Plaintiff has never possessed an accurate transcript or law degree, despite completing PCL's academic program.

79. On May 31, 2024, The California State Bar revokes PCL's charter due to protracted non-compliance, effectively shutting down the school.

## **VII. STATE BAR'S FAILURE TO ENFORCE COMPLIANCE DESPITE AWARENESS OF VIOLATIONS**

80. As part of their gatekeeping function, State Bar Admissions staff, including Wilson, Leonard, and Ching, were likely aware of PCL's record compliance issues before Plaintiff

1 matriculated because the State Bar requires student transcripts to be submitted to verify  
2 eligibility prior to taking the FYLSX. Plaintiff made repeated attempts to rectify the errors  
3 and engage the State Bar.

4 81. The State Bar was also on notice of the disparate outcomes at PCL and in the legal education  
5 marketplace, as evidenced by the 2023 State Bar report entitled, “Profiling the Outcomes on  
6 the FYLSX, a true and accurate copy obtained from the State Bar’s website as Exhibit 3 and  
7 the true and accurate copy of the formal grievance filed by Nancy Popp at Exhibit 2. Despite  
8 this knowledge, the State Bar failed to take meaningful action to address these issues,  
9 thereby emboldening and perpetuating PCL Defendant’s pattern of disregard for educational  
10 standards and student welfare that predates Plaintiff’s enrollment in 2019.

12 82. The State Bar’s 2023 report, ‘Profiling the Outcomes of the FYLSX’ (Exhibit 3), established  
13 that prolonged education timelines significantly reduce the likelihood of bar passage,  
14 particularly for African American males. Approximately nine in one hundred African  
15 American males who complete their first year at schools like PCL pass the FYLSX,  
16 resulting in a persistent ninety-one percent failure rate. PCL’s deliberate obstruction of  
17 Plaintiff’s educational progress, including delayed graduation and inaccurate records, has  
18 directly harmed his chances of passing the bar exam.

20 83. This ongoing non-compliance has resulted in PCL’s greater than 90% attrition rate for  
21 African Americans since at least 2017, with fewer than 1 in 10 entrants ultimately receiving  
22 a degree even though PCL had a duty to vet candidates prior to matriculation.

24 **VIII. FRAUDULENT REPRESENTATIONS AND MANIPULATION OF  
25 STUDENT RECORDS**

26 84. Defendant Spiro, acting on behalf of PCL, knowingly engaged in misrepresentations  
27 regarding Plaintiff’s tuition payments and credit arrangements. Specifically, on January 9,  
28

1           2020, Defendant Spiro approved Plaintiff to work up to 40 hours at \$15 per hour from  
2           January 4 to January 13, with a maximum gross pay of \$600. Defendant Spiro indicated that  
3           Plaintiff could credit this amount against his tuition but required Plaintiff to provide written  
4           approval for such an arrangement. Despite Plaintiff's compliance, subsequent email  
5           exchanges revealed inconsistencies in Defendant Spiro's accounting, ultimately resulting in  
6           Plaintiff being overcharged by approximately \$2,400. Plaintiff's efforts to clarify these  
7           discrepancies were met with further obstruction.

8           85. PCL's practices, including manipulation of academic records and denial of necessary  
9           educational resources, disproportionately harmed African American students, including  
10          Plaintiff. Statistical evidence demonstrates that African American students at PCL  
11          experienced significantly lower graduation and bar passage rates, akin to the  
12          unconstitutional segregation addressed in *Keyes v. School District No. 1*, 413 U.S. 189  
13          (1973).

14  
15          **IX. FAILURE TO DISCLOSE NON-COMPLIANCE AND MISLEADING  
16          REPRESENTATION OF ACCREDITATION**

17          86. PCL failed to adhere to State Bar regulations by enrolling out-of-state students attending  
18          remotely and failing to provide proper and timely disclosures as required under Rule 2.3(D).  
19          PCL also maintained inaccurate records and misrepresented its compliance status, impeding  
20          Plaintiff's ability to transfer or receive accurate transcripts, thereby obstructing his  
21          educational progress. Despite its already limited capacity to provide adequate educational  
22          resources to students, PCL expanded its class size without addressing pre-existing  
23          deficiencies, which further exacerbated disparities in academic support and administrative  
24          oversight. This expansion disproportionately impacted African American students, whose  
25          graduation and bar passage rates were already lower due to PCL's non-compliance.  
26  
27  
28

Furthermore, PCL's failure to comply with Rule 9.1, which mandates accurate record-keeping and administrative procedures, directly harmed Plaintiff by preventing him from timely transferring or pursuing further educational opportunities.

87. PCL did not disclose its non-compliance with State Bar regulations, including the improper awarding of units, which prevented students from initial informed decision making or later transfer to other law schools or timely qualifying for federal financial aid. (See Exhibit 201A, previously filed accompanying a request for judicial notice at ECF 102, p. 9-10)

## - FIRST CAUSE OF ACTION -

**RICO CLAIM: DAMAGES UNDER THE VIOLATION OF THE  
RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT  
(18 U.S.C. §1962(c))**

#### 88. Summary:

Plaintiff brings this RICO cause of action under 18 U.S.C. § 1962(c), which prohibits any person employed by or associated with an enterprise engaged in or affecting interstate commerce from conducting or participating in the enterprise's affairs through a pattern of racketeering activity. The statutory elements required for a valid RICO claim under § 1962(c) are: i. The existence of an enterprise; ii. The enterprise engaged in or affected interstate commerce; iii. The defendant's participation in the enterprise's affairs; iv. The defendant's participation was through a pattern of racketeering activity; and v. The plaintiff suffered injury to business or property by reason of the racketeering activity.

89. Adherence to Rule 9(b) Standards:

Plaintiff's Fourth Amended Complaint adheres to the heightened pleading standards required for RICO claims involving allegations of fraud. Each predicate act, including wire and

1 mail fraud, systematic misrepresentation, obstruction of justice, and financial exploitation, is  
2 detailed with specificity to identify the actors, dates, methods, and fraudulent statements made.  
3 These allegations are described with particularity in Paragraphs 33-84, which collectively  
4 establish a pattern of racketeering activity carried out through the enterprise.  
5

6 90. Predicate Acts Establishing Racketeering Activity:

7 The pattern of racketeering activity is substantiated by specific fraudulent acts, including:  
8

- 9
- 10 a. The dissemination of falsified transcripts through email and mail systems between 2019 and  
11 2023 by Defendants Spiro, Pena, Sarinana, Bouffard, and others.
- 12 b. The misrepresentation of PCL's accreditation status and institutional compliance to students  
13 and donors via email communications.
- 14 c. The obstruction of Plaintiff's ability to transfer through the manipulation of transcript  
15 records.
- 16 d. Coercive billing practices employed to extract tuition payments under false pretenses. The  
17 details of these predicate acts are provided in Paragraphs 33, 35, 37, 38, 41, and 42.
- 18

19 91. Pattern of Racketeering Activity:

20

21 Defendants engaged in a continuous pattern of racketeering activity involving multiple  
22 predicate acts of mail fraud (18 U.S.C. § 1341) and wire fraud (18 U.S.C. § 1343) over a period  
23 exceeding two years. These acts were committed with the common purpose of defrauding  
24 students, obstructing justice, and suppressing evidence of institutional deficiencies. The conduct  
25 was systematic, continuous, and directed at maintaining control over PCL's operations through  
26 deceptive and coercive practices.

27

1       92. Incorporation of Allegations:

2  
3       Plaintiff re-alleges and incorporates by reference each allegation contained in Paragraphs 33-84,  
4       focusing on the facts that demonstrate the pattern of racketeering activity, including wire and  
5       mail fraud (see ¶¶ 33, 35, 37, 38, 41, 42, 76, 84), systematic misrepresentation and fraudulent  
6       schemes (¶¶ 33-40, 42-44, 46-57, 76, 84), institutional failure and facilitated fraud (¶¶ 35, 37,  
7       39, 41, 43, 46, 47, 49-57, 76, 84), and the financial and emotional damages suffered by the  
8       Plaintiff as a direct result (see ¶¶ 33-84, 76, 84). Because the fraudulent actions were carried out  
9       through electronic communications and postal services, they are alleged to meet the definition  
10      of predicate acts under RICO.

12       93. Enterprise Definition and Structure:

13  
14       Plaintiff alleges that Defendants, including but not limited to The Peoples College of Law  
15       (PCL) Board of Directors, Spiro, Pena, Bouffard, Gonzalez, Torres, Aramayo, Sanchez, Zuniga,  
16       Maestas, Franco, Gillens, and Viramontes, operated as an associated-in-fact enterprise under 18  
17       U.S.C. § 1961(4). The enterprise functioned with a hierarchical structure in which Defendants  
18       exercised control over PCL's educational, administrative, and financial operations. The common  
19       purpose of the enterprise was to maintain control over PCL through fraudulent practices,  
20       including falsifying academic records, obstructing student progress, and retaliating against  
21       individuals who exposed misconduct. This enterprise operated continuously from at least 2020  
22       to the present.

24  
25       94. Intentional Avoidance of Accountability:

26  
27       Defendants engaged in a pattern of conduct aimed at avoiding accountability and frustrating  
28       proper oversight. This conduct was facilitated by the State Bar's documented refusal to

1 intervene in student disputes and PCL's manipulation of enrollment practices to perpetuate  
2 fraudulent billing and transcript management. Defendants knowingly utilized deceptive  
3 practices to continue collecting tuition and avoid regulatory scrutiny.  
4

5 **95. Financial Exploitation Scheme:**

6  
7 PCL engaged in a scheme designed not only to defraud students through fraudulent  
8 academic practices but also to misappropriate funds through financial exploitation. Despite  
9 minimal operational costs, PCL collected substantial tuition payments and solicited donations  
10 under false pretenses, funneling funds into an opaque structure devoid of proper oversight. This  
11 arrangement strongly suggests that the scheme was also aimed at misappropriating funds rather  
12 than providing the educational services promised to students. The fraudulent collection of funds  
13 is detailed in ¶¶ 37, 40, 41, 48, 50, 52, 56, 65, and 66.  
14

15  
16 **96. Targeting of Vulnerable Populations:**

17 PCL knowingly recruited students from economically disadvantaged and underrepresented  
18 backgrounds under the pretense of providing affordable, social-justice-oriented legal education.  
19 Despite its obligations to provide adequate support, PCL expanded enrollment without  
20 addressing record-keeping deficiencies, grade inflation, or administrative failures. The attrition  
21 rate for African American students exceeded 90% since 2017, illustrating the predatory nature of  
22 the scheme. These allegations are supported by the facts detailed in Paragraphs 37, 41, 42, and  
23 85.  
24

25  
26 **97. Institutional Non-Compliance:**

27 PCL's pattern of non-compliance with State Bar regulations dates back to 2017, as  
28 evidenced by the 2020 Inspection Report and subsequent probationary periods. Defendants'

1 failure to maintain accurate records, provide adequate disclosures, and comply with Rule 4.241  
2 and California Business and Professions Code § 6061 reflects deliberate and prolonged  
3 disregard for regulatory standards. Defendants' conduct is further detailed in Paragraphs 36, 40,  
4 43, 46, 48, 56, 65, and 66.  
5

6 **98. Preferential and Discriminatory Treatment:**

7 Defendants engaged in selective and prejudicial treatment of students. For example, Spiro  
8 provided prompt corrections for Nancy Popp's transcripts but intentionally delayed or refused  
9 corrections for Plaintiff's transcripts despite repeated requests. This discriminatory handling of  
10 records obstructed Plaintiff's academic progress and resulted in financial and emotional harm.  
11

12 **99. Evidence Supporting Fraudulent Scheme:**  
13

14 Evidence of PCL's manipulation and misrepresentation of compliance is supported by: (a)  
15 multiple versions of erroneous transcripts (Exhibit 1); (b) the State Bar's investigative reports  
16 and press releases (Exhibits 201A and 201B); (c) student accounts or complaints, including  
17 correspondence from Plaintiff and other students to PCL leadership (Exhibits 3 & 4); (d)  
18 statements by Defendants, such as Spiro's June 8, 2022 email to the State Bar asserting  
19 compliance (Exhibit 6); and (e) planning improper elections and likely unlawful ousting of PCL  
20 members (Exhibit 7). The totality of this evidence supports Plaintiff's RICO claims by  
21 establishing a pattern of fraudulent conduct and manipulation of academic records designed to  
22 obstruct Plaintiff's educational progress and harm his professional prospects.  
23

25 **100. Violation of Unaccredited Law School Rules:**  
26

27 According to State Bar reports, Defendants continuously or repeatedly violated the 2008  
28 through 2022 Guidelines for Unaccredited Law School Rules, including Rules 4.240, 4.241, and

1       4.242. These violations include failing to maintain accurate records, submit required reports, and  
2 provide adequate disclosure statements to students. The deliberate manipulation of institutional  
3 compliance protocols further underscores the Defendants' fraudulent intent.

4       101.       Coordination of Fraudulent Scheme:

5              Defendants coordinated a scheme through Peoples College of Law ('PCL') to  
6 intentionally manipulate academic records, knowingly misrepresent institutional  
7 accreditation status, systematically delay degrees, and obstruct students' transfers.  
8  
9              Defendants' scheme involved multiple instances of mail and wire fraud to induce continued  
10 enrollment and tuition payments from students, particularly exploiting African American  
11 students, including Plaintiff. Plaintiff relied on these misrepresentations to his significant  
12 financial and professional detriment.

13       102.       Pattern of Racketeering Activity from 2019 to 2024:

14              From at least May 2019 to May 31, 2024, Defendants engaged in a continuous pattern of  
15 racketeering activity that included: i. Wire and mail fraud by disseminating false information  
16 about PCL's bar passage rates, compliance status, and instructional offerings; ii. Extortion by  
17 threatening to deny services or withhold academic credentials unless additional payments were  
18 made; iii. Unreasonable restraint of trade by awarding improper academic credits to discourage  
19 transfer to other institutions; iv. Violations of State Bar Act §6001.1 by failing to recuse from  
20 administrative decisions involving direct conflicts of interest; v. Breaches of fiduciary duty and  
21 knowingly providing false assurances of compliance and withholding accurate academic  
22 records; vi. Violations of civil or constitutional rights by discriminating against students based  
23 on protected characteristics.

24  
25       103.       Defendants as RICO Persons:

1 At all relevant times, the Defendants were and are “persons” within the meaning of 18  
2 U.S.C. § 1961(3) and § 1962(c)-(d). The enterprise comprised both natural persons and entities  
3 operating collectively to further a fraudulent scheme.

4 104. Definition of Defendants:

5 The term “Defendants” refers to all named natural persons listed below the caption for this  
6 First Cause of Action. Each Defendant acted individually and collectively to participate in the  
7 racketeering enterprise described herein.

8 105. Participation in Racketeering Activity:

9 The natural persons named as Defendants are alleged to have participated in a pattern of  
10 racketeering activity through direct acts of fraud, obstruction of justice, and systematic  
11 misrepresentation, which collectively caused injury to Plaintiff’s business and property.

12 106. Facilitation of Fraudulent Conduct by the State Bar:

13 The State Bar’s documented refusal to enforce its own guidelines, coupled with PCL’s  
14 inducement of instructors to provide unpaid services under false pretenses, facilitated a  
15 continuous pattern of fraudulent conduct. PCL collected tuition from students under the guise of  
16 providing a legitimate legal education while knowingly failing to meet statutory requirements.

17 107. Specific Predicate Acts:

18 Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez, Torres, Viramontes, and Sanchez  
19 actively participated in or facilitated multiple predicate acts, including transmitting falsified  
20 academic transcripts electronically on August 3, 2021, and making false representations  
21 regarding PCL’s compliance or accreditation status between 2021 and 2023. These actions were  
22 carried out to maintain false accreditation status, thereby securing continuous tuition payments  
23 and donations while avoiding regulatory scrutiny.

24 108. Establishment of RICO Enterprise:

1       From approximately 2019 through 2024, Defendants knowingly engaged in a pattern of  
2 racketeering activity involving multiple acts of mail and wire fraud by misrepresenting  
3 academic credit hours, institutional compliance, and instructional offerings. These fraudulent  
4 activities were designed to maintain PCL's revenue stream and impede students' efforts to  
5 transfer or obtain legitimate credentials.  
6

7       109.       Use of PCL as Instrument of Fraud:

8              Defendants operated the RICO Enterprise through PCL, utilizing its institutional  
9 infrastructure and communications systems to facilitate predicate acts. The enterprise's  
10 fraudulent activities affected interstate commerce by recruiting students nationwide and utilizing  
11 interstate mail and wire systems to disseminate deceptive information.

12       110.       Manipulation of Academic Records:

13              Defendants intentionally manipulated academic transcripts and misrepresented instructional  
14 credit hours to maintain institutional accreditation and secure student enrollment. For example,  
15 on August 3, 2021, Spiro instructed Plaintiff not to communicate with the California State Bar  
16 about transcript discrepancies, thereby attempting concealment of fraudulent practices and  
17 obstructing Plaintiff's efforts to seek redress.

18       111.       Ongoing Non-Compliance with State Bar Regulations:

19              PCL's directors, officers, and agents, including Gonzalez, Pena, Spiro, Sarinana, and  
20 Leonard, were aware of PCL's ongoing breaches of regulatory requirements, including  
21 inaccurate record-keeping, improper credit calculations, and refusal to provide accurate  
22 transcripts. Despite receiving formal grievances and complaints, such as the 2020 Inspection  
23 Report and the grievance filed by Nancy Popp, PCL continued these practices. PCL's persistent  
24 noncompliance, facilitated by inadequate enforcement from the State Bar, constitutes predicate  
25  
26  
27  
28

1 acts of mail and wire fraud because PCL continued to collect tuition under false pretenses of  
2 regulatory compliance and offering legitimate educational services.

3       112.       Distribution of Inaccurate Transcripts:

4              Defendants knowingly provided inaccurate transcripts to Plaintiff and similarly situated  
5 students, obstructing their educational progress and professional advancement. These actions  
6 were part of a continuous pattern of fraudulent conduct intended to conceal PCL's institutional  
7 failures. (See Exhibits 1, 2 and 9).

8       113.       Violation of Unaccredited Guideline 5.9:

9              PCL's deliberate and ongoing violation of Unaccredited Guideline 5.9 related to improper  
10 credit calculation constitutes a fraudulent scheme involving the manipulation of academic  
11 records to mislead students, including Plaintiff, about the legitimacy of their earned credits.  
12 Dean Juan Manuel Sarinana and Registrar Zuñiga played direct and central roles in perpetuating  
13 this fraudulent conduct. On April 28, 2022, Sarinana admitted in writing to the State Bar's  
14 Office of Admissions that PCL continued to award semester unit credits for courses taught on a  
15 quarter schedule, in direct violation of Unaccredited Guideline 5.9 (Exhibit C, ECF 199, p. 1-3)

16       114.       Admission of Non-Compliance:

17              Rather than implementing corrective measures, Sarinana attempted to justify PCL's non-  
18 compliance by claiming that PCL historically awarded semester credits for quarter-based classes  
19 despite the State Bar's explicit requirement that quarter units be calculated based on ten (10)  
20 hours of classroom instruction per unit rather than fifteen (15). Sarinana acknowledged that this  
21 non-compliant practice had been in place since at least the 2019-2020 academic year and  
22 continued throughout Plaintiff's enrollment. (Id.)

23       115.       Intentional Continuation of Fraudulent Practices:

1 Sarinana's admission, coupled with the State Bar's written directive to PCL regarding non-  
2 compliance, establishes a knowing and willful continuation of fraudulent practices. Despite  
3 notice from the State Bar, Sarinana and Zuñiga continued to disseminate inaccurate academic  
4 records reflecting improper credit calculations. These falsified records were provided to  
5 students, including Plaintiff, who relied on their accuracy for transfer, graduation, and eligibility  
6 for the California Bar Examination. (Id.)  
7

8 116. Pattern of Racketeering Through False Records:

9 PCL's ongoing non-compliance was reinforced by its pattern of submitting misleading  
10 records and false representations to the State Bar. By knowingly distributing inaccurate  
11 academic records via mail and electronic communication, Sarinana and Zuñiga engaged in a  
12 pattern of racketeering activity involving repeated acts of wire and mail fraud. This conduct  
13 demonstrates a deliberate scheme to misrepresent PCL's compliance with regulatory  
14 requirements for the purpose of financial gain and to avoid accountability.  
15

16 117. Racketeering Elements Met Under 18 U.S.C. §§ 1341 and 1343:

17 The ongoing fraudulent scheme, evidenced by Sarinana's admissions as Dean and Zuñiga's  
18 dissemination of false transcripts as Registrar, satisfies the elements of wire and mail fraud  
19 under 18 U.S.C. §§ 1341 and 1343. The scheme was intended to defraud Plaintiff and other  
20 students of their legitimate educational credentials and opportunities. (See Exhibit C, ECF 102,  
21 p. 1-2).

22 118. False Compliance Communications:

23 Defendants continued to perpetuate their fraudulent scheme through consistent email  
24 communications falsely assuring compliance. On June 17, 2022, Natalie Leonard, a Program  
25 Analyst for the State Bar of California's Office of Admissions, explicitly acknowledged to  
26

1 Plaintiff that the provided transcripts were “disputed and incomplete,” indicating ongoing  
2 knowledge of fraudulent transcript representations.

3       119.       Admission of Transcript Manipulation:

4       On November 9, 2022, Spiro, acting as attorney for PCL, engaged in email correspondence  
5 with Natalie Leonard. In this exchange, Spiro acknowledged transcript inaccuracies and  
6 admitted awareness of ongoing non-compliance with State Bar standards. Spiro indicated an  
7 intent to amend certain transcripts but provided no assurance of comprehensive corrective  
8 measures. (Exhibit C, ECF 199, pgs. 75 – 95, judicially noticed in ECF 248).

9       120.       Admission of Non-Compliance:

10       In the same November 9, 2022, exchange, Spiro wrote to Leonard that Defendants  
11 knowingly relied on Plaintiff to create his own coursework. This admission confirms the  
12 Defendants’ intentional failure to provide mandatory instructional hours due to the schemes  
13 operational and financial motives. (Exhibit C, ECF 199, 75-95).

14       121.       Use of Mail and Wire Systems:

15       Defendants used both electronic mail and U.S. mail systems to disseminate fraudulent  
16 transcripts and false assurances of compliance. These communications caused Plaintiff and  
17 similarly situated students to detrimentally rely on these misrepresentations in making  
18 significant educational, financial, and career decisions.

19       122.       Systematic Fraudulent Conduct:

20       The fraudulent conduct perpetrated by Defendants was systematic, continuous, and related.  
21 Persistent false communications through at least May 2024, when PCL’s accreditation was  
22 revoked by the California State Bar, demonstrate a clear threat of ongoing illegal activities.

23       123.       Proximate Cause of Injury:

1 As a direct and proximate result of Defendants' fraudulent actions and operation of the  
2 RICO Enterprise, Plaintiff has suffered substantial damages including, but not limited to, loss of  
3 educational opportunities, financial expenditures on tuition and related costs, severe emotional  
4 distress, and significant impairment of professional reputation and career progression.  
5

6 124. Parallel to Discriminatory Practices:

7 The pattern of racketeering activity alleged here parallels discriminatory practices addressed  
8 in *Keyes v. School District No. 1, Denver, Colo.* The systematic targeting and exploitation of  
9 African American and minority students, including manipulation of academic records and  
10 obstruction of educational opportunities, constitutes a coordinated effort to exploit a vulnerable  
11 population for financial gain.

12 125. Repeated Use of Mail for Fraudulent Communications:

13 Between May 2019 and March 2024, Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez,  
14 and Torres repeatedly used U.S. Mail to distribute false academic transcripts and accreditation  
15 assurances to Plaintiff and similarly situated students. Specific communications dated June 17,  
16 2022, and November 9, 2022, falsely represented PCL's compliance and induced continued  
17 enrollment and tuition payments.

18 126. Use of Wire Communications to Disseminate Fraudulent Statements:

19 Between May 2019 and March 2024, Defendants Spiro, Pena, Bouffard, Aramayo, Zuniga,  
20 Sarinana, Viramontes and Sanchez systematically used electronic mail to disseminate false  
21 statements regarding PCL's bar passage rates, accreditation, accounts receivable and financial  
22 solvency to students, prospective students, and donors. These misrepresentations directly  
23 influenced enrollment and financial decisions based on knowingly false information. (See  
24 Exhibits 8 and 9)

25 127. Impact on Interstate Commerce:

1 Defendants conducted their fraudulent activities through PCL, which substantially affects  
2 interstate commerce by recruiting students nationwide, utilizing interstate mail and wire  
3 systems, and receiving federal funding through State Bar-supported oversight activities.  
4

5 128. Facilitation of Racketeering by PCL Agents and State Bar Employees:

6 Notably, evidence supports that individual PCL administrators and State Bar employees,  
7 including the Defendants named herein, actively facilitated ongoing racketeering activities  
8 through deliberate indifference and failure to enforce applicable guidelines. This deliberate  
9 inaction enabled continuous fraudulent representations to be made to Plaintiff and other students  
10 over multiple academic terms, resulting in significant economic harm and perpetuating systemic  
11 racial inequalities within the legal education system. (See ECF 199, Exhibit C; also see Exhibits  
12 1 and 9)

13 129. Discriminatory Impact and RICO Violation:

14 Defendants' fraudulent conduct disproportionately impacted African American students,  
15 including Plaintiff, exacerbating systemic racial inequalities within legal education. This  
16 disparate treatment constitutes a violation of federal law, specifically including the civil rights  
17 protections embedded within RICO. Plaintiff was targeted through a combination of fraudulent  
18 misrepresentation, obstruction of academic progress, and intentional manipulation of records  
19 designed to deny him the benefits of his education. (See Exhibit 3.)  
20

21 130. Evidence of Discriminatory Treatment:

22 The discriminatory nature of Defendants' conduct is further evidenced by their preferential  
23 treatment of Nancy Popp. Unlike Plaintiff, whose transcripts were intentionally manipulated and  
24 obstructed, Popp's transcripts were promptly corrected upon her request. This disparity strongly  
25 supports Plaintiff's contention that Defendants engaged in discriminatory conduct based on  
26 protected status or arbitrary and capricious decision-making. (See Exhibit 1)  
27  
28

1           131.       Consequences of Discriminatory Conduct:

2           As a result of Defendants' fraudulent and discriminatory conduct, Plaintiff and other  
3 similarly situated students were denied equal access to educational opportunities. Plaintiff  
4 suffered tangible damages, including financial harm, emotional distress, and lost career  
5 opportunities, all of which are directly attributable to Defendants' racketeering activities.  
6

7           132.       Structure of the RICO Enterprise:

8           The RICO Enterprise described herein was operated through a structured hierarchy  
9 involving Defendants Sarinana, Bouffard, Pena, Spiro, Gonzalez, Torres, Viramontes, Aramayo,  
10 Sanchez and the other Defendants. This enterprise functioned through PCL's institutional  
11 infrastructure, with each Defendant assigned specific roles to advance the fraudulent scheme.  
12 Specifically:

- 13           a. Spiro (Former Dean): Directed the manipulation of transcripts, provided misleading  
14 accreditation assurances, and coordinated efforts to obstruct Plaintiff's attempts to  
15 seek external remedies.
- 16           b. Pena (Vice President) & Sarinana (Former Dean): Facilitated the dissemination of  
17 false academic records and obstructed Plaintiff's educational progress.
- 18           c. Gonzalez (President) & Torres: Misrepresented institutional accreditation status and  
19 compliance to students and regulatory bodies.
- 20           d. Viramontes: Recruited faculty, coordinated school policy aimed at silencing student  
21 grievances, and communicated fraudulent information through wire communications.
- 22           e. Sanchez: Disseminated fraudulent statements regarding election status and financial  
23 solvency through wire communications.

1 f. Aramayo, Maestas, Gillens, Sarin and Bouffard: Participated in administrative  
2 decisions, facilitated fraudulent communications, and engaged in improper debt  
3 collection activities under threat of denying essential educational services.  
4

5 133. Coordinated Scheme for Financial Gain:

6 Because each Defendant played a critical role in furthering the fraudulent enterprise's  
7 objectives, their actions constituted a coordinated scheme designed to perpetuate fraud and  
8 secure status or financial gain through unlawful means, including the manipulation of academic  
9 records, dissemination of false accreditation information, and coercive billing practices.

10 134. Mail and Wire Fraud Legal Standards:

11 Mail and wire fraud require (1) a scheme to defraud, (2) use of mail or wire communication  
12 in furtherance of the scheme, and (3) intent to deceive or cheat (*Schmuck v. United States*, 489  
13 U.S. 705, 711 (1989)). Defendants' actions meet all elements necessary to establish violations  
14 under these statutes. The RICO Enterprise's fraudulent activities were systematically carried out  
15 through communications disseminated via electronic mail and postal services. This conduct  
16 persisted over multiple years and involved numerous fraudulent transactions, demonstrating a  
17 deliberate scheme to misrepresent PCL's compliance for financial gain.

18 135. Interstate Commerce Impact:

19 The RICO Enterprise's actions substantially affected interstate commerce by soliciting  
20 tuition payments, donations, and enrollment from students and supporters residing in multiple  
21 states. These transactions were processed through interstate banking systems, and fraudulent  
22 representations were transmitted via email, phone calls, and postal services. The fraudulent  
23 scheme extends beyond California, impacting individuals who relied on PCL's false  
24 representations of accreditation and legitimacy.

25 136. Intent to Defraud:

1       The predicate acts of mail and wire fraud were executed with specific intent to defraud Plaintiff  
2 and similarly situated students. Defendants relied on false representations to solicit tuition  
3 payments, maintain institutional accreditation, and obstruct Plaintiff's ability to transfer or achieve  
4 academic progress. The enterprise's fraudulent scheme directly caused Plaintiff's injuries.  
5

6           137.       Specific Predicate Acts:

7       The predicate acts of mail and wire fraud committed by the Defendants include, but are not  
8 limited to:

- 9           a. August 3, 2021: Robert Ira Spiro sent an email instructing Plaintiff not to contact the  
10           California State Bar regarding transcript discrepancies, intentionally concealing  
11           fraud.
- 12           b. June 17, 2022: Natalie Leonard (State Bar Analyst) acknowledged to Plaintiff that  
13           the transcripts provided were disputed and incomplete, evidencing PCL's fraudulent  
14           misrepresentation.
- 15           c. November 9, 2022: Spiro admitted to Leonard that Plaintiff was required to create  
16           his own coursework, confirming Defendant's failure to provide mandatory  
17           instructional hours.
- 18           d. 2021-2023: Viramontes and Sanchez electronically transmitted misleading  
19           curriculum information to faculty and students and potential donors as well as  
20           facilitated communications related to course offerings that were non-compliant with  
21           state law or State Bar guidelines.
- 22           e. Pena sent communications to the Secretary of State registering organizational  
23           changes that resulted from unlawful ousting or noncompliant election with the  
24           approval and participation of Gillens, Maestas, Franco and others.

1 f. Pena, Bouffard, Sarin, and Spiro ordered, oversaw, or sanctioned improper collection  
2 of payments under threat of denying educational services.

3 g. Venegas, Aramayo and Zuniga coordinated the collection of fees and dissemination  
4 of inaccurate student information to students and the State Bar.

5 138. Fraud-Induced Reliance:

6 These fraudulent communications intentionally induced Plaintiff to continue enrollment and  
7 make tuition payments under false pretenses, directly causing financial and professional harm.  
8 The fraudulent communications and actions directly resulted in harm to Plaintiff by:

- 9 10 a. Inducing continued enrollment and payment of tuition based on false representations  
11 of accreditation.  
12 b. Obstructing Plaintiff's ability to transfer to another institution by falsifying  
13 transcripts, resulting in lost educational opportunities and professional advancement.  
14 c. Causing emotional distress through ongoing uncertainty about academic progress  
15 and professional licensure.

16 17 139. Prevention of Educational and Professional Advancement:

18 Defendants knowingly provided falsified transcripts, withheld accurate academic records,  
19 and made false representations about accreditation status. These actions directly prevented  
20 Plaintiff from transferring to other institutions, completing his legal education, or qualifying for  
21 licensure. Each instance of fraudulent communication, including but not limited to the emails  
22 dated June 17, 2022, and November 9, 2022, contributed directly to Plaintiff's economic and  
23 professional harm.

24 25 140. Breach of Duty of Care:

26 Defendants' failure to provide accurate transcripts and comply with institutional  
27 accreditation standards also constitutes a breach of the duty of care owed to Plaintiff as a  
28

1 student. The abrogation of PCL administrators and associated parties directly contributed to  
2 Plaintiff's injuries because their acts of fraudulent misrepresentation were performed within the  
3 scope of their institutional responsibilities and in reckless disregard of Plaintiff's educational  
4 and professional rights.

5       141.       Disparate Treatment and Racial Inequality:

6       The disparate treatment evidenced by Defendants' preferential treatment of Nancy Popp,  
7 contrasted with their obstruction of Plaintiff's efforts to obtain accurate records, further  
8 demonstrates the discriminatory nature of the enterprise's conduct. Because Defendants' fraudulent  
9 scheme disproportionately impacted African American students, including Plaintiff, the racketeering  
10 activity also perpetuated systemic racial inequalities within the legal education system. This pattern  
11 of conduct violates federal RICO statutes and civil rights protections intended to ensure equal  
12 access to educational opportunities.

13       142.       Violation of Statutory and Constitutional Rights:

14       The actions of the Defendants, in their individual capacities, violated clearly established  
15 statutory and constitutional rights. Their failure to enforce regulations, implement  
16 discriminatory policies, and retaliate against Plaintiff for exercising his First Amendment rights,  
17 are violations of well-established legal principles. A reasonable person in their position would  
18 have known that their conduct was unlawful.

- 19           a. **Civil Rights Violation under 42 U.S.C. § 1983:** These defendants, as agents of PCL  
20           were authorized agents of the State Bar and also acting in their individual capacities,  
21           are alleged to have engaged in a conspiracy to deprive the plaintiff of his civil rights  
22           under 42 U.S.C. § 1983. Specifically, they violated the plaintiff's constitutional  
23           rights to a fair education and career progression by manipulating his transcript,  
24           denying him transfer options, failing to process his exemption request, conspiring to  
25  
26  
27  
28

1 oust him as a duly elected corporate officer, and implementing the State Bar's non-  
2 interference policy to effect and operate their alleged scheme. Many of these actions  
3 were taken under the color of state law as the State Bar exercises regulatory control  
4 over PCL, rendering the individual defendants liable for constitutional violations  
5 including the denial of due process and equal protection under the Fourteenth  
6 Amendment.

- 7
- 8 b. **Unruh Civil Rights Act Violation (Cal. Civ. Code § 51):** Defendants' conduct  
9 discriminated against Plaintiff based on his protected status as an African-American  
10 male student. Their actions deprived Plaintiff of equal access to educational  
11 opportunities and career advancement, violating rights afforded to him under  
12 California state law.
- 13 c. **Violation of California Education Code § 201:** This section guarantees that no  
14 person shall be subjected to discrimination in any program or activity conducted by  
15 an educational institution. By conspiring to manipulate Plaintiff's academic standing,  
16 denying access to lawful exemptions, and interfering with his career progression,  
17 Defendants engaged in unlawful conduct that directly violates the protections  
18 afforded to Plaintiff under California law.
- 19 d. **Bane Act Violation (Cal. Civ. Code § 52.1):** Defendants' use of threats,  
20 intimidation, or coercion to interfere with Plaintiff's rights to fair education, career  
21 progression, and due process under both federal and state law constitutes a violation  
22 of the Bane Act.
- 23 e. **Violation of California Education Code § 66270:** This statute prohibits  
24 discrimination based on race, sex, disability, and other protected characteristics in  
25
- 26
- 27
- 28

1 postsecondary educational institutions. The manipulation of Plaintiff's academic  
2 standing and career opportunities constitutes discriminatory interference.

3 f. **Conspiracy Motivated by Racial Animus:** The alleged conspiracy to deprive  
4 Plaintiff of his civil rights was motivated by racial animus, further compounding the  
5 violation of Plaintiff's rights under federal and state law.

6 143. Ultra Vires Acts and Abuse of Authority:

7 Defendants, many of them licensees ostensibly acting under color of law, either knowingly  
8 acted ultra vires or in excess of their authority or enforced unlawful rules that were certain to  
9 produce unlawful outcomes, causing harm to Plaintiff. Defendants' actions were beyond the  
10 scope of their lawful authority and were intended to harm Plaintiff's educational and  
11 professional progress. (See Exhibits 2 and 7.)

12 144. Relevant Conduct Involving Plaintiff's Harm:

13 The relevant conduct involved:

- 14 a. The manipulation of Plaintiff's transcript. (See Exhibit 1)  
15 b. The denial of viable transfer options. (See Exhibit 201A at ECF 102, p. 45)  
16 c. The failure to process his exemption request in good faith. (*Id.* at 6-7)  
17 d. Reliance on and exploitation of the "non-interference" policy. (*Id.* at 2)  
18 e. Disseminating misleading information about PCL's compliance status. (*Id.* at 9-10)  
19 f. Protracted failure to reasonably oversee and regulate PCL's operations. (*Id.* at 2)  
20 g. Abusive and unreasonable fee collection and contractual renege.

21 145. Harm Caused by Non-Compliance:

22 Because of the Defendant's conduct and willful non-compliance, Plaintiff was prevented  
23 from completing his legal education and obtaining his degree, causing him financial and  
24 emotional harm. Defendants knew or should have known that the policies were unlawful  
25

1 themselves or that their application would inevitably lead to unlawful consequences. PCL  
2 agents, directors, officers and administrators had a duty to ensure that its policies and  
3 regulations were lawful and did not infringe upon students' rights because PCL, as a regulated  
4 entity, had a duty to comply with the state statutes and State Bar regulations and to operate in a  
5 lawful and ethical manner. The individual defendants, as officers and employees of PCL, had a  
6 duty to act in accordance with the law and to uphold their professional and ethical obligations.  
7 (*Id.* at 9)

8       146.       Proximate Cause and Equitable Tolling:

9       A RICO plaintiff must show that the predicate acts were the proximate cause of the injury  
10 suffered (*Bridge v. Phoenix Bond & Indem. Co.*, 553 U.S. 639, 654 (2008)). Equitable tolling  
11 applies where the defendant's fraudulent concealment prevented the plaintiff from discovering  
12 the harm (*Rotella v. Wood*, 528 U.S. 549, 561 (2000)).

13       147.       Justification for Equitable Tolling:

14       The concealment of accurate transcript information delayed Plaintiff's discovery of fraud,  
15 warranting equitable tolling. The ongoing pattern of deceit, coupled with Defendants' intentional  
16 misrepresentations, justifies equitable tolling of any applicable statutes of limitations as Plaintiff  
17 reasonably relied on the Defendants' assurances of compliance. Plaintiff was unaware of the full  
18 extent of the fraudulent scheme until it was uncovered through his persistent investigations.  
19 Defendants' intentional misrepresentations and deliberate concealment of critical information  
20 prevented Plaintiff from discovering the harm at an earlier date.  
21  
22

23       148.       Direct Harm Caused by Defendants' Conduct:

24       The fraudulent communications and actions of the Defendants directly resulted in Plaintiff's  
25 harm by:  
26

1           a. Inducing Continued Enrollment and Financial Losses: Defendants knowingly  
2           misrepresented accreditation and compliance to induce Plaintiff to continue his enrollment at  
3           PCL. These fraudulent assurances caused Plaintiff to make substantial financial expenditures  
4           on tuition and related costs under false pretenses.

5           b. Falsifying Transcripts and Obstructing Transfer: Defendants' manipulation of Plaintiff's  
6           transcripts and refusal to provide accurate academic records obstructed Plaintiff's ability to  
7           transfer to other institutions, complete his legal education, and pursue professional  
8           advancement.

9           c. Emotional Distress and Professional Harm: The prolonged uncertainty and denial of  
10          Plaintiff's educational progress, compounded by Defendants' deliberate obstruction and  
11          defamation resulted in severe emotional distress and damage to Plaintiff's professional  
12          reputation.

13          149.       As a direct result of Defendants' racketeering activities, Plaintiff suffered specific  
14          financial losses, including approximately \$55,000 in tuition, significant delay and  
15          impairment of professional licensure and earning potential, and substantial emotional  
16          distress directly caused by reliance upon Defendants' fraudulent misrepresentations.

17          150.       WHEREFORE, Plaintiff respectfully requests this Court grant compensatory  
18          damages, treble damages pursuant to 18 U.S.C. §1964(c), attorneys' fees, costs of suit,  
19          injunctive relief against ongoing and future fraudulent acts, and such other relief as is  
20          outlined in the 'Remedies and Relief' section of this pleading.

1                   **- SECOND CAUSE OF ACTION -**

2                   **CLAIM FOR VIOLATION OF THE UNRUH CIVIL RIGHTS ACT**  
3                   **(CALIFORNIA CIVIL CODE § 51)**  
4                   **(The Peoples College of Law)**

5                   151.         **Summary:** This cause of action arises from Defendants' violation of the Unruh Civil  
6                   Rights Act, California Civil Code § 51, through discriminatory practices that denied Plaintiff  
7                   equal access to educational opportunities, benefits, and services provided by PCL.  
8                   Defendants, including PCL and its agents, engaged in intentional practices that resulted in  
9                   unequal treatment of Plaintiff based on his race. These discriminatory acts were carried out  
10                  by Defendants Gonzalez, Pena, Spiro, Sarinana, Sarin, and other agents of PCL through acts  
11                  of deliberate neglect, manipulation of academic records, and refusal to provide  
12                  accommodations extended to other students including selective transcript corrections,  
13                  refusal to provide essential courses, imposing arbitrary requirements, class interference,  
14                  retaliation and deliberately neglecting Plaintiff's educational progress. This conduct, enabled  
15                  by the State Bar's failure to enforce regulations, resulted in substantial harm to Plaintiff's  
16                  education and career prospects.

17  
18                  152.         **Incorporation of Allegations:** Plaintiff re-alleges and incorporates by reference  
19                  each allegation contained in ¶¶ 1-121, with particular emphasis on the allegations  
20                  concerning the denial of full and equal accommodations and the discriminatory treatment  
21                  based on race (see ¶¶ 22-30, 56-58, and 83-90, 120-121, 144-145 and 149).

22  
23                  153.         **Business Establishment:** PCL, as a private law school offering legal training in  
24                  exchange for tuition, qualifies as a 'business establishment' within the meaning of California  
25                  Civil Code § 51. As such, it is required to provide full and equal accommodations to all  
26                  students regardless of race or other protected characteristics.

154. **Discriminatory Conduct by PCL and Its Agents:** Defendants Gonzalez, Pena,  
Spiro, Sarinana, and Maestas, as agents of PCL, engaged in conduct that intentionally or  
effectively denied Plaintiff equal access to educational opportunities and services on the  
basis of race.

155. PCL's deliberate refusal to provide accurate transcripts, denial of necessary coursework, and manipulation of academic records disproportionately harmed Plaintiff and other minority students. The State Bar's failure to intervene despite repeated complaints enabled PCL to continue these discriminatory practices without correction or accountability.

156. **Discriminatory Intent and Impact:** Defendants' conduct was substantially motivated by Plaintiff's race. PCL's discriminatory policies and practices, including refusal to correct transcripts, denial of course access, and imposing unequal requirements, disproportionately harmed Plaintiff by obstructing his academic progress and preventing him from completing his legal education. PCL's discriminatory practices are evidenced by its preferential treatment of other students, such as Nancy Popp, whose transcripts were corrected promptly upon request, whereas Plaintiff's requests for corrections were repeatedly denied or obstructed.

157. **Violation of the Unruh Act:** PCL's discriminatory practices constitute a violation of the Unruh Civil Rights Act because they deny Plaintiff full and equal accommodations, advantages, facilities, privileges, or services as required under California Civil Code § 51.

158. PCL's failure to address issues raised by students, including the grievances  
documented in the 2020 Inspection Report and Nancy Popp's complaint, demonstrates  
inconsistent and selective responses to student concerns. PCL promptly addressed the  
complaints raised by Nancy Popp, a white female, as evidenced by documented corrections  
to her transcripts. In contrast, PCL failed to adequately respond to Plaintiff's grievances

1 concerning inaccurate records and course access. This disparate treatment, which  
2 disproportionately harmed Plaintiff as a minority student, suggests a pattern of arbitrary or  
3 discriminatory practices in violation of the Unruh Civil Rights Act.  
4

5 **159. Specific Acts of Discrimination:** Plaintiff alleges that the actions and inactions of  
6 PCL, through its officers, directors, employees, and agents, acting under color of state law  
7 due to PCL's extensive regulation by and relationship with the State Bar, and the State Bar,  
8 through its employees acting outside their official capacities, have caused him harm due to  
9 the lack of an accurate transcript and the planned and intentional denial of a degree.

10 **160.** PCL's ongoing violation of Unaccredited Guideline 5.9 concerning improper credit  
11 calculation constitutes discriminatory conduct that denied Plaintiff full and equal  
12 accommodations, privileges, and advantages as required under California Civil Code § 51.  
13 Despite receiving multiple notifications from students, including Plaintiff, regarding  
14 discrepancies between quarter-based instruction and semester-based credit awards,  
15 Defendants Sarinana, Pena, Zuñiga, Aramayo and Spiro acting as agents of PCL, knowingly  
16 continued to issue transcripts reflecting incorrect credit calculations. (See ECf 199, Exhibit  
17 C, p. 72-74).

18 The discriminatory acts by PCL include:  
19

- 20     a. Selectively refusing to correct Plaintiff's transcripts while providing corrections for  
21         similarly situated students, such as Nancy Popp.  
22  
23     b. Denying Plaintiff access to necessary courses required for graduation, despite  
24         offering these courses to other students.  
25  
26     c. Imposing heightened and arbitrary requirements on Plaintiff, creating barriers not  
27         applied to others.  
28

d. Failing to maintain and enforce policies ensuring equal treatment and transparency in educational services.

161.       **Harm to Plaintiff:** As a result of these discriminatory practices, Plaintiff suffered tangible harm including:

- a. Financial loss due to delayed graduation and additional educational expenses.
  - b. Emotional distress resulting from denial of academic opportunities.
  - c. Loss of educational opportunities and professional impairment, directly affecting Plaintiff's ability to pursue a legal career.

The acts or omissions used to obtain this result include:

- i. Gonzalez, Pena, Spiro, Sarinana, Bouffard, Sarin, Franco and Maestas denied, conspired to deny, or conspired to aid or incite a denial of the full and equal advantages, facilities, privileges, or services in the educational opportunities offered by PCL.
  - ii. **Enabling Discriminatory Practices:** The State Bar’s consistent failure to enforce regulatory standards and reliance on a ‘non-interference’ policy enabled PCL’s agents to deny Plaintiff critical educational resources, shielded discriminatory practices from scrutiny, and fostered a permissive environment that disproportionately harmed Plaintiff. The State Bar’s failure to enforce its regulations, combined with its non-interference policy, emboldened PCL to continue engaging in discriminatory conduct without fear of accountability. By refusing to intervene or enforce oversight despite clear knowledge of PCL’s ongoing violations, the State Bar created an environment where PCL felt empowered in its discriminatory practices against Plaintiff with impunity. (See Exhibit 201A, previously filed accompanying a request for judicial notice at ECF 102, p. 2)

- iii. PCL's exploitation and informed reliance on the State Bar's "non-interference" policy that gave notice to the actors of student non-recourse and that inevitably and disproportionately affected students from unaccredited schools. (*Id.*)
- iv. PCL's misleading advertising and recruitment practices that targeted vulnerable communities, as facilitated by Gonzalez, Pena, Spiro, and Sarinana. (*Id.* at 42)
- v. PCL's failure to provide a quality education and accurate transcripts, because of the actions and inactions of Gonzalez, Pena, Spiro, Sarin, Bouffard and Sarinana. (*Id.* at 9-10)

162. PCL's discriminatory practices, including in allowing certain records to be corrected with the remainder uncorrected, despite its duty of accurate record keeping, regulatory authority and knowledge of the issues, constitutes a violation of the Unruh Civil Rights Act.

163. PCL, through its officials and employees, targeted vulnerable classes, induced matriculation and operated under conditions likely to result in student failure, without adequate oversight or intervention.

164. Defendants' conduct, including the deliberate issuance of inaccurate transcripts, refusal to provide necessary corrections, and the imposition of arbitrary requirements, disproportionately impacted Plaintiff due to his race and status as a student from an unaccredited school. PCL's failure to provide accurate transcripts and equal access to educational resources directly impaired Plaintiff's ability to transfer, graduate, and pursue licensure, constituting a violation of the Unruh Civil Rights Act.

165. As a result of these discriminatory practices, Plaintiff suffered financial harm,  
emotional distress, and a loss of educational and professional opportunities.

166. Prayer for Relief: Plaintiff seeks:

- a. Compensatory damages according to proof.
  - b. Punitive damages to the extent allowed by law.

- c. Injunctive relief to prevent future discriminatory practices.
  - d. Attorneys' fees and costs as permitted under California law.

## **– THIRD CAUSE OF ACTION –**

## **CLAIM FOR NEGLIGENCE AND NEGLIGENCE PER SE**

(The Peoples College of Law and Its Board of Directors, Gonzales, Spiro, Pena, Franco, DeuPree, Silberger, Gillens, Viramontes)

167. **Summary:** This cause of action arises from the Defendants' negligent actions, including their failure to provide accurate transcripts, refusal to award degrees despite completion of program requirements, and lack of proper oversight of PCL's compliance with educational standards. Specifically, the Defendants, including PCL and its officers, breached their duty by:

- a. Failing to maintain accurate records of Plaintiff's academic progress, as evidenced by the erroneous transcripts issued from 2020 to the present day.
  - b. Refusing to recognize Plaintiff's completion of required coursework, despite clear documentation of his academic efforts.
  - c. Implementing policies that obstructed Plaintiff's educational progress and retaliating against him for protected activities, including his whistleblowing efforts and advocacy for institutional transparency.

These negligent actions were disproportionately harmful to Plaintiff, constituting negligence per se under applicable regulations, including Rules 2.3(D), 4.241, and 9.1. As a result, Plaintiff suffered significant economic and non-economic damages.

168. Plaintiff re-alleges and incorporates by reference each allegation contained in ¶¶ 33-  
84, 88, 91, 102-120, 186-206, and 213-216 of the Fourth Amended Complaint.

169. A showing of negligence requires Plaintiff to demonstrate duty, breach of duty,  
causation and damages.

1 170. Duty to Comply with Law:

2 Defendants knew or should have known that their policies and actions were unlawful or that  
3 their application would inevitably result in unlawful consequences. PCL agents, directors, officers,  
4 and administrators had a duty to ensure compliance with state statutes and State Bar regulations. As  
5 a regulated entity, PCL was obligated to operate lawfully and ethically. The individual defendants,  
6 as officers and employees of PCL, were responsible for upholding their professional and ethical  
7 obligations. (Id. at 9)

8 171. The negligent actions of PCL and the State Bar, including the failure to provide

9 accurate transcripts, the delay in awarding degrees, and the lack of proper oversight, have  
10 disproportionately impacted African American students and have specifically harmed the  
11 Plaintiff.

12 172. In a November 9, 2022, email from Spiro, acting as counsel for PCL, to Natalie

13 Leonard, Spiro acknowledged PCL's failure to monitor Plaintiff's academic progress,  
14 despite being aware of the necessity for oversight. Spiro admitted:

15 "PCL should have monitored the student's progress in creating the courses. We at PCL  
16 acknowledge we should have done better. We should have checked with the student  
17 periodically to verify how he was progressing in creating the courses. I believe we did not. I  
18 doubt PCL will again make an agreement with a student for the student to take courses out  
19 of order and create courses to resolve problems caused by taking them out of order. But if  
20 PCL ever does that again, PCL surely will establish a timetable for verifying with the student  
21 the progress in creating the courses." (See ECF199, pages 75 - 95. The Court has ruled that  
22 these records are judicially noticed to the extent they bear on Plaintiff's ability to amend his  
complaint at ECF 248).

23 173. Despite Spiro's apparent admission of negligence, this statement was, in fact, a

24 deliberate falsehood intended to obscure PCL's retaliatory conduct. Contrary to Spiro's  
25 claim, he never permitted Plaintiff to create coursework or devise an alternative academic  
26 plan. Instead, Spiro categorically refused to offer the required coursework or approve any  
27 proposed alternatives advanced by Plaintiff. This refusal was a direct act of retaliation

1 against Plaintiff for his prior whistleblowing and advocacy for transparency at PCL. Spiro's  
2 communication was a calculated effort to mislead regulators, shifting the blame onto  
3 Plaintiff while concealing PCL's systemic failures and retaliatory practices.  
4

5 174. Spiro's November 9, 2022, email was not a genuine acknowledgment of negligence  
6 but a strategic misrepresentation intended to shield PCL from regulatory scrutiny. By falsely  
7 implying that Plaintiff had the autonomy to create his own courses and that PCL's failure  
8 was merely one of oversight, Spiro sought to obscure the reality: PCL's categorical refusal to  
9 provide necessary coursework or accept Plaintiff's reasonable alternatives was a deliberate  
10 effort to obstruct Plaintiff's progress in retaliation for his protected activities.

11 175. Notwithstanding Spiro's misrepresentation, PCL's failure to establish and implement  
12 a coherent process for oversight, combined with its admission that such oversight was  
13 required, demonstrates both negligence and recklessness. The failure to provide adequate  
14 guidance and establish reasonable accommodations for Plaintiff's academic progress  
15 constituted a breach of PCL's duty of care. As a direct result of PCL's breach, Plaintiff  
16 experienced significant harm, including educational setbacks, emotional distress, financial  
17 losses, and professional impairment.  
18

19 176. The Defendants' acknowledgment of their failure to monitor Plaintiff's progress, as  
20 documented in Spiro's November 9, 2022 email, coupled with Spiro's explicit refusal to  
21 accept Plaintiff's proposed academic alternatives, constitutes a breach of duty. Despite being  
22 aware of the necessity for oversight, Spiro and other PCL officials actively obstructed  
23 Plaintiff's attempts to continue his education by refusing reasonable accommodations. This  
24 refusal occurred after Plaintiff had made multiple documented attempts to address transcript  
25 discrepancies and propose compliant coursework solutions, all of which were denied  
26 without reasonable justification.  
27  
28

1       177.       The Defendants' actions were not only negligent but intentionally retaliatory, as  
2                   evidenced by Spiro's refusal to accept alternative coursework plans following Plaintiff's  
3                   protected activities, including whistleblowing and advocacy for institutional transparency.  
4                   By refusing to engage in a reasonable accommodation process and obstructing Plaintiff's  
5                   efforts to complete his education, the Defendants' conduct proximately caused Plaintiff's  
6                   harm, including lost educational opportunities, financial damages, and emotional distress.

7       178.       Defendants, as officers and directors of PCL, had a duty to ensure the accuracy of  
8                   student transcripts, timely offering of compliant legal education, and adherence to the  
9                   educational contract and implied covenants of good faith and fair dealing. Their failure to do  
10                  so constitutes a breach of this duty.

11       179.       These defendants had a regulatory duty to oversee PCL's compliance with  
12                  educational standards. Their failure to intervene or address known issues at PCL constitutes  
13                  negligence per se, as it violated statutes and regulations designed to protect students like the  
14                  Plaintiff.

15       180.       **Duty of Care:** A duty of care exists where a party has an obligation to act with  
16                  reasonable care to avoid causing harm to another. In the context of educational institutions,  
17                  this duty includes maintaining accurate records, providing truthful information about  
18                  educational programs, and adhering to statutory and regulatory requirements governing legal  
19                  education. Negligence per se applies when a party violates a statute or regulation intended to  
20                  protect a particular class of persons, resulting in harm to a member of that class.

21       181.       The Defendants breached their duty of care in the following ways:

- 22                  a.       Failure to Provide Accurate and Timely Transcripts: Despite repeated requests from  
23                          Plaintiff, PCL failed to provide accurate transcripts that reflected completed  
24                          coursework, as evidenced by the erroneous transcripts provided from 2020 through

2023. This failure was compounded by Spiro's admission in the November 9, 2022 email, acknowledging PCL's deficient monitoring processes.

- b. Failure to Award Degrees Despite Completion of Program Requirements: Plaintiff completed all required coursework; however, PCL's refusal to recognize this completion and issue a degree was an arbitrary denial intended to obstruct Plaintiff's progress. Spiro's November 9, 2022 email further illustrates PCL's failure to adhere to established protocols for verifying academic progress.
  - c. Failure to Maintain Accurate Records: PCL failed to comply with Rule 9.1 by neglecting to maintain accurate and complete academic records. Erroneous transcripts, inconsistent credit allocations, and the absence of coherent documentation standards are evidenced by multiple versions of Plaintiff's transcripts provided by PCL.
  - d. Failure to Adhere to Student Solicitation and Matriculation Standards: PCL violated Rule 2.3(D) by failing to make proper and timely disclosures to Plaintiff upon enrollment and throughout his academic tenure. This includes failing to disclose the improper awarding of units, which prevented Plaintiff from making informed decisions about his educational path.
  - e. Failure to Oversee Compliance with Regulations: Despite PCL's known deficiencies, including those documented in the 2020 Inspection Report and subsequent probationary period, the Defendants failed to implement corrective measures or maintain compliance with State Bar regulations.
  - f. Allowing Discriminatory Practices: The disparate treatment of Plaintiff compared to other students, such as Nancy Popp whose transcript issues were corrected promptly

1 and accurately, demonstrates a pattern of discriminatory practices intended to  
2 retaliate against Plaintiff for his advocacy and whistleblowing.

3 g. Retaliation Against Plaintiff for Exercising His First Amendment Rights: Defendants  
4 actively obstructed Plaintiff's attempts to address transcript discrepancies and  
5 propose reasonable alternatives. Spiro's November 9, 2022 email mischaracterized  
6 Plaintiff's efforts and falsely suggested PCL permitted Plaintiff to devise his own  
7 coursework plan. In reality, PCL refused Plaintiff's reasonable proposals and  
8 engaged in retaliatory conduct intended to chill Plaintiff's advocacy.

9  
10 182. The Defendants' breaches of duty, including their failure to adhere to statutory  
11 standards, constitute negligence per se. Plaintiff suffered harm directly resulting from the  
12 Defendants' actions, including financial loss, emotional distress, and educational setbacks.

13  
14 183. PCL, through its agents Sarinana and Zuñiga, breached its duty of care to Plaintiff by  
15 knowingly issuing inaccurate transcripts that failed to comply with the credit calculation  
16 requirements set forth under Unaccredited Guideline 5.9. Despite receiving multiple notices  
17 from students, including Plaintiff, and explicit directives from the State Bar highlighting  
18 PCL's non-compliance, Sarinana and Zuñiga continued to disseminate academic records  
19 reflecting improper credit awards. (See Exhibit C, previously filed accompanying a request  
20 for judicial notice at ECF 102, p. 1-3).

21  
22 184. As acknowledged by Sarinana in his April 28, 2022 correspondence with the State  
23 Bar's Office of Admissions, PCL had improperly awarded semester unit credits for courses  
24 taught under a quarter system since the 2019-2020 Academic Year. Rather than correcting  
25 this discrepancy or ensuring compliance with Guideline 5.9, Sarinana and Zuñiga  
26 perpetuated the issuance of inaccurate transcripts that directly harmed Plaintiff by

1 preventing him from timely transferring, graduating, or pursuing further educational  
2 opportunities. (Id.)

3 185. PCL's negligence, facilitated by the actions of Sarinana and Zuñiga, resulted in  
4 tangible harm to Plaintiff's educational progress and career prospects. PCL's failure to  
5 adhere to recognized standards of care and its deliberate disregard for regulatory  
6 requirements constituted a breach of duty that caused Plaintiff financial losses, emotional  
7 distress, and diminished professional opportunities.

8 186. Negligence *per se* applies where a party violates a statute or regulation intended to  
9 protect a specific class of persons, resulting in harm to a member of that class. Relevant  
10 standards include Rules 2.3(D), 4.241, and 9.1, which establish requirements for accurate  
11 record-keeping, appropriate disclosures, and adherence to established educational standards.  
12 Here, Defendants' violations include:

- 13  
14 a. Failing to maintain accurate records as required by Rule 9.1.  
15 b. Failing to disclose accurate unit awards and other essential academic information as  
16 required by Rule 2.3(D).  
17 c. Failing to provide timely and compliant educational services as required by Rule  
18 4.241.

19 187. Defendants failed to comply with the 2022 Guidelines for Unaccredited Law School  
20 Rules, specifically Rules 4.240, 4.241, and 4.242, by failing to maintain accurate records,  
21 submit required reports, and provide adequate disclosure statements to students.

22 188. **Negligence *per se*:** By failing to comply with these standards, the Defendants acted  
23 negligently *per se*. These violations were intended to protect students like Plaintiff from  
24 harm, and the resulting inaccuracies and refusals to provide required services caused  
25 Plaintiff tangible harm.

1       189.       The Defendants' actions, individually and collectively, constitute negligence per se  
2                  as they violated statutory and regulatory standards governing educational institutions,  
3                  including Rules 2.3(D), 4.241, and 9.1, as well as Plaintiff's First Amendment rights.  
4

5       190.       The Defendants' violations of applicable regulations constitute negligence per se,  
6                  and Plaintiff has demonstrated a direct causal connection between the Defendants' conduct  
7                  and his injuries.

8       191.       Gonzales, Spiro, Pena, Franco, DeuPree, Silberger, Gillens, breached a duty by  
9                  allowing their employees and agents to act in opposition to or outside the scope of their  
10                 employment to the detriment of the Plaintiff, the Defendants, as agents of PCL or employees  
11                 or appointees of the State Bar, breached their duty to hire and utilize only individuals who  
12                 would comply with the law and to properly train and supervise those individuals to ensure  
13                 compliance.  
14

15       192.       PCL allowed Spiro, Pena, Gonzalez, Sarin, Bouffard, Maestas, Torres to discriminate  
16                 against Todd so that PCL could continue operating in noncompliance.

17       193.       PCL failed to accommodate or supply services, even after Todd multiple requests for  
18                 the provision of "teach-out" or other classes to accommodate the State Bar's communicated  
19                 requirements and PCL's commitments.

20       194.       Spiro appears to dismiss Plaintiff's concerns and downplays the severity of the issues  
21                 at PCL, which could be seen as further evidence of negligence in addressing the situation.  
22  
23                 (See Exhibit 6)

24       195.       As a proximate result of PCL's breach of duty, Plaintiff was injured, in amounts to be  
25                 proven at trial.

26       196.       This conduct is alleged to constitute inclusively negligence, under the common law,  
27                 statutory or negligence per se doctrines as it violated statutes, regulations, and rules designed  
28

1 to protect individuals like the plaintiff and because the consequences are likely to have  
2 resulted from the negligence or fault of the Defendants.

3       **197. Res Ipsa Loquitur:** Alternatively, the doctrine of Res Ipsa Loquitur applies to this  
4 cause of action, as the harm Plaintiff suffered is of the type that ordinarily does not occur in  
5 the absence of negligence. Specifically:

- 6           a. **Issuance of Multiple Erroneous Transcripts:** Over a period of years, Defendants  
7 provided conflicting versions of Plaintiff's academic records, spanning from 2020  
8 through 2023. This repeated issuance of erroneous transcripts suggests a systematic  
9 failure in PCL's record-keeping and administrative processes that would not occur if  
10 appropriate oversight mechanisms were in place.
- 11          b. **Failure to Recognize Completion of Required Coursework:** Despite clear evidence of  
12 Plaintiff's completion of required coursework, PCL refused to award a degree. Such  
13 conduct is extraordinary and demonstrates a failure to adhere to standard academic  
14 practices and regulatory compliance.
- 15          c. **Non-Compliance with Regulatory Requirements:** Defendants' failure to comply  
16 with established regulations under Rules 2.3(D), 4.241, and 9.1, despite having  
17 exclusive control over administrative processes, record-keeping systems, and  
18 compliance mechanisms, indicates negligence.
- 19          d. **State Bar's Failure to Enforce Compliance:** The State Bar's failure to enforce  
20 compliance, despite documented reports of non-compliance and procedural  
21 deficiencies, further underscores a lack of appropriate oversight that does not absolve  
22 the Defendant's of their own duties or requisite oversight requirements, further  
23 demonstrating negligence.

1 198. **Exclusive Control:** The instrumentalities causing the harm, namely the school's  
2 administrative processes, educational services, record-keeping systems, and compliance  
3 mechanisms, were all under the exclusive control of PCL's officers, directors, employees,  
4 and agents. Plaintiff, as a student, had no control over these processes and relied upon the  
5 Defendants to fulfill their duties in good faith.  
6

7 199. **No Contributory Negligence:** Plaintiff took reasonable steps to address transcript  
8 discrepancies, propose compliant coursework solutions, and engage in dialogue with PCL  
9 administrators and the State Bar. His efforts to resolve these issues were met with  
10 obstruction, retaliation, and deception rather than appropriate corrective measures.  
11 Therefore, the harm Plaintiff suffered was not the result of any failure on his part.  
12

13 200. **Type of Harm Ordinarily Not Occurring Absent Negligence:** The harm suffered  
14 by Plaintiff, including the denial of accurate transcripts, failure to receive a degree despite  
15 completion of coursework, financial loss, and emotional distress, are not harms that  
16 ordinarily occur in the absence of negligence. Properly maintained records, appropriate  
17 administrative oversight, and compliance with established standards are essential functions  
18 of any educational institution and regulatory body.  
19

20 201. **Causal Connection to Defendants' Negligence:** Thus, applying the doctrine of Res  
21 Ipsa Loquitur, the Defendants' negligence can be inferred from the circumstances  
22 surrounding their failure to maintain accurate records, comply with regulatory requirements,  
23 and provide adequate oversight. This inference is further supported by the Defendants' own  
24 admissions of oversight failures, including Spiro's November 9, 2022, email, which  
25 acknowledges PCL's failure to monitor Plaintiff's academic progress and the subsequent  
26 probation and withdrawal of its charter to operate as a law school effective May 2024. Under  
27 the doctrine of Res Ipsa Loquitur, the burden of proof shifts to the Defendants to provide  
28

1 evidence that the harm was not caused by their negligence. As established in *Byrne v.*  
2 *Boadle*, 2 H. & C. 722, 159 Eng. Rep. 299 (Ex. Ch. 1863) (holding that barrels do not fall  
3 from warehouses without negligence) and *Ybarra v. Spangard*, 25 Cal. 2d 486, 154 P.2d 687  
4 (Cal. 1944) (holding that the Res Ipsa Loquitur doctrine applies even when multiple parties  
5 have control over the instrumentality causing harm), when the evidence strongly suggests  
6 negligence under the exclusive control of Defendants, it is their responsibility to rebut this  
7 presumption. Their continued failure to do so further supports Plaintiff's claims of  
8 negligence.

10 202. The harm suffered by Todd – the denial of an accurate transcript and degree, the  
11 financial loss, PCL's loss of charter and the emotional distress resulting therefrom – is not  
12 the type of harm that ordinarily occurs in the absence of negligence. The instrumentalities of  
13 harm, namely the school's administration, educational services, record-keeping systems, and  
14 the State Bar's regulatory oversight, were under the exclusive control of the Defendants. The  
15 Plaintiff, as a student, had no control over these instrumentalities and relied on the  
16 Defendants to fulfill their duties. Therefore, it is reasonable to infer that the harm suffered  
17 by Plaintiff was more likely than not caused by Defendants' negligence.

19 203. Defendants, as officers, directors, employees, and agents of PCL, owed a duty of  
20 care to Plaintiff to act reasonably and prudently in their roles as administrators and educators  
21 at the law school. Defendants breached their duty of care by failing to provide accurate and  
22 timely transcripts, failing to award a degree despite Plaintiff's completion of the program  
23 requirements, failing to maintain accurate records and provide timely access to them, failing  
24 to adhere to student solicitation, recruitment, and matriculation standards, and failing to  
25 oversee PCL's compliance with regulations. This conduct constitutes negligence per se as it  
26 violated statutes, regulations, and rules designed to protect individuals like Plaintiff from the  
27  
28

1 harm suffered. As a direct and proximate result of their negligence and negligence per se,  
2 Plaintiff suffered damages.

3 204. PCL, and its employees, officers, agents, and appointees, owed a duty of care to  
4 Plaintiff to act reasonably and prudently in their roles as offerors and regulators of legal  
5 education. They breached their duty of care by failing to oversee PCL's compliance with  
6 regulations, implementing and enforcing policies that harmed students, allowing PCL to  
7 operate in a non-compliant and predatory manner, failing to address Plaintiff's complaints  
8 and concerns, making untrue or misleading statements or omissions about the quality and  
9 compliance of PCL's legal education program, PCL's fundraising and operating costs, and  
10 the State Bar's enforcement of rules and regulations, implementing "underground rules" and  
11 failing to follow mandated administrative procedures, failing to adopt or reconcile federal  
12 and state unit hour requirements, failing to provide due process in handling Plaintiff's  
13 exemption request, and allowing discriminatory practices in law school transfers. This  
14 conduct constitutes negligence per se as it violated statutes, regulations, and rules designed  
15 to protect individuals like Plaintiff from the harm suffered. As a direct and proximate result  
16 of their negligence and negligence per se, Plaintiff suffered damages.

17 205. **Defendants breached their duty of care by:**

- 18 a. Failing to provide accurate and timely transcripts to Plaintiff. (See Exhibit 201A,  
19 previously filed accompanying a request for judicial notice at ECF 102, p. 10, 37)  
20 b. Failing to award a degree despite Plaintiff's completion of the program requirements.  
21 c. Failing to maintain accurate records or provide access to them. (*Id.* at 10, 37)  
22 d. Failing to adhere to student solicitation, recruitment, and matriculation standards.  
23 (*Id.* at 10)  
24  
25  
26

- 1 e. Failing to oversee PCL's compliance with regulations or implementing or enforcing  
2 policies that harmed students, such as the "non-interference" policy. (*Id.* at 2)
- 3 f. Allowing, facilitating, or encouraging PCL to operate in a non-compliant and  
4 predatory manner by conduct including failing to address Plaintiff's complaints and  
5 concerns. (*Id.* at 2)
- 6 g. Making untrue or misleading statements about the quality and compliance of PCL's  
7 legal education program, PCL's fundraising and operating costs, students and the  
8 State Bar's enforcement of rules and regulations. (*Id.* at 9-10, 13-14, 20, 40-41)
- 9 h. Failing to use tuition and donations for their intended purposes. (*Id.* at 13-14)
- 10 i. Failing to provide an accounting of funds after lawful demands. (*Id.* at 13-14)
- 11 j. Implementing "underground rules" and failing to follow mandated administrative  
12 procedures. (*Id.* at 9)
- 13 k. Failing to adopt or reconcile federal or state unit hour requirements. (*Id.* at 31)
- 14 l. No due process in handling Plaintiff's exemption request. (*Id.* at 6-7)
- 15 m. Allowing discriminatory practices in law school transfers. (*Id.* at 62)
- 16 n. Retaliating against Plaintiff for exercising his First Amendment right to free speech.  
17 (*Id.* at 44)

18 206. The State Bar's inspection report in 2020 identified numerous instances of PCL's  
19 non-compliance with educational standards, including inaccurate record-keeping and  
20 inadequate policies and procedures. Despite this knowledge, the State Bar's directors,  
21 officers, agents, and employees acting in their individual capacities failed to take timely and  
22 effective action to protect students from the harm caused by PCL's probable negligence,  
23 likely constituting negligence per se. The State Bar defendants in their individual capacities  
24 failure to take action against Spiro and Leonard, despite being aware of the serious  
25  
26  
27  
28

1 allegations outlined in the Sitton Letter (Exhibit 5), likely constitutes negligence and a  
2 breach of their fiduciary duty to protect the public. The State Bar's inaction allowed Spiro  
3 and Leonard to continue their alleged misconduct, directly harming Todd and others.  
4

5 207. Defendants' conduct, as described above, constitutes negligence per se as it violated  
6 statutes, regulations, and rules designed to protect individuals like Plaintiff from the harm  
7 suffered.  
8

9 208. Plaintiff's harm is directly traceable to these negligent actions, as the policies and  
10 practices of Defendants mirror those found unconstitutional in *Keyes v. School District No.*  
11 *I, Denver, Colo.*, where similar failures in oversight and discriminatory practices led to  
12 systemic educational inequality.  
13

14 209. As a direct and proximate result of Defendants' negligence and negligence per se,  
15 Plaintiff suffered economic damages, including but not limited to past and future lost wages,  
16 tuition and fees paid to PCL, and other out-of-pocket costs. Plaintiff also suffered non-  
17 economic damages, including emotional distress, pain and suffering, loss of enjoyment of  
18 life, and damage to reputation.  
19

#### – FOURTH CAUSE OF ACTION –

#### **CLAIM FOR NEGLIGENT HIRING, RETENTION, AND SUPERVISION** **(Against the Peoples College of Law, The Board of Directors, Officers, and Agents of** **Peoples College of Law, Spiro, Pena, Gillens, Silberger, Zuniga, Aramayo)**

210. Summary: This cause of action alleges that the Peoples College of Law (PCL), the  
211 and individual agents, employees, directors and officers of the organizations breached their  
212 respective duties of care by negligently hiring, retaining, and supervising their employees  
213 and agents. This negligence resulted in these individuals acting outside the scope of their  
214 employment or in violation of established laws and regulations, causing harm to the Plaintiff  
215 and other similarly situated students. The failure of both the entities and directors, officers  
216 and agents to hire, retain, and supervise qualified individuals has caused Plaintiff to suffer  
217 physical, emotional, and financial damages.  
218

1 and agents to adequately train, supervise, and monitor their personnel enabled them to  
2 engage in misconduct, including discriminatory practices, failure to enforce regulations, and  
3 obstructionist conduct, thereby causing and contributing to Plaintiff's harm.

- 4 i. Plaintiff hereby re-alleges and incorporates by reference each allegation contained in  
5 ¶¶ 35-210, with particular emphasis on the allegations of discriminatory policies and  
6 practices, failure to enforce regulations, negligent management of educational  
7 programs, improper hiring and retention of individuals known to engage in wrongful  
8 conduct, and inadequate training and supervision of personnel (see ¶¶ 15-37, 54-60,  
9 69-76, 102-120).
- 10 ii. Exhibits 1, 2, 3, 5, 6, and 201A: Providing evidence of inaccurate transcripts, the  
11 State Bar's reports of PCL's non-compliance, communications between parties, and  
12 the State Bar's inspection report, further supporting the various causes of action.

13  
14  
15 **PCL's Negligent Hiring, Retention, and Supervision**

16  
17 211. PCL's negligent management of its educational programs, including maintaining  
18 inaccurate records, failing to provide necessary courses, and collecting unlawful fees,  
19 resulted in foreseeable harm to Plaintiff. Despite receiving notice of these issues through  
20 formal complaints and documented reports, PCL continued these practices without  
21 correction, directly impacting Plaintiff's educational progress and ability to transfer or  
22 graduate.

23  
24 **212. 148. Harm Caused by Non-Compliance:**

25  
26 213. Because of Defendants' conduct and willful non-compliance, Plaintiff was prevented  
27 from completing his legal education and obtaining his degree. This denial of educational  
28 opportunities caused Plaintiff financial and emotional harm, as well as impairment of his  
professional advancement.

1           **214.       Duty to Hire or Employ Agents Who Comply with Law:**

2           PCL had a duty to hire or engage only those professors, deans, directors, agents, or  
3           officers who would comply with the law and had a duty to properly train and supervise all to  
4           ensure that they did so.

5           Defendants knew or should have known that their policies and actions were unlawful  
6           or that their application would inevitably result in unlawful consequences. PCL agents,  
7           directors, officers, and administrators had a duty to ensure employment or appointment as  
8           agents those who would in good faith exercise reasonable judgement and effort to maintain  
9           compliance with state statutes and State Bar regulations. As a regulated entity, PCL was  
10           obligated to operate lawfully and ethically. The individual defendants, as officers and  
11           employees of PCL, were responsible for upholding their professional and ethical obligations  
12           and utilizing others who would do the same. (Id. at 9)

13           PCL breached that duty by hiring or continuously engaging Gonzalez, Pena, Spiro,  
14           Sarinana, Sarin, Bouffard, Gillens, Franco, Sanchez, Torres, Deupree, Silbiger, Pomposo,  
15           Zuniga, Aramayo, Maestas, and Venegas and then by failing to properly train and supervise  
16           them, PCL allowed these individuals to operate in continual and egregious noncompliance  
17           and discriminate against Plaintiff in retaliation for his efforts to correct the issues internally  
18           and via external requests for assistance to the State Bar.

19           As a proximate result of PCL's breach of duty, Plaintiff was injured, in amounts to be  
20           proven at trial.

21           **REMEDIES & RELIEF REQUESTED**

22           Plaintiff re-alleges and incorporates by reference all prior allegations contained in  
23           ¶¶ 1-220, insofar as they establish the Defendants' liability and the Plaintiff's entitlement  
24           to the remedies sought herein.

1 220. Todd did not receive an accurate transcript or degree after completion of the  
2 curriculum and is owed money.  
3

4 **A. Monetary Relief**

5 221. Compensatory damages in an amount to be proven at trial against all Defendants,  
6 jointly and severally, for the harm caused by their conduct as described in the First through  
7 Eighth Causes of Action.

8 222. Treble damages, totaling \$750,000.00, as allowed by Civil Code section 52(a)  
9 against eligible Defendants, jointly and severally, for the harm caused by their conduct as  
10 described in the Seventh Cause of Action.

11 223. Punitive damages against eligible Defendants, jointly and severally, to punish them  
12 for their malicious and willful misconduct and to deter similar conduct in the future.

13 **B. Declaratory Relief**

14 224. A declaration that PCL's practices, as described in this Complaint, violate the Unruh  
15 Civil Rights Act and the California Business and Professions Code.

16 **C. Injunctive Relief**

17 225. The Plaintiff respectfully requests that the Court order the Defendants to issue a  
18 public statement acknowledging their wrongdoing and offering a sincere apology to the  
19 Plaintiff and all other students who have been adversely affected by their actions and  
20 inactions. Such a statement should explicitly recognize the harm caused by the Defendants'  
21 conduct and express a commitment to rectifying the systemic issues that allowed such harm  
22 to occur.

23 226. The Plaintiff further requests that the Court order the Defendants to establish a  
24 restitution fund to compensate all students who have suffered financial or other losses as a  
25

1 result of the Defendants' conduct. The fund should be administered by an independent third  
2 party and provide adequate compensation for tuition, fees, lost wages, and other damages  
3 incurred by the affected students.

4 227. A permanent injunction ordering PCL to:

- 5 i. Cease all operations and dissolve as a corporation under Corporations Code  
6 section § 6518.  
7 ii. Refund all tuition and fees paid by Plaintiff.  
8

9 **D. Other Relief**

- 10 i. An order directing PCL to provide Plaintiff with an accurate, complete, and  
11 official transcript reflecting all coursework and grades earned, and to confer upon  
12 Plaintiff a Juris Doctorate degree.  
13

14 **E. Additional Remedies**

- 15 i. Civil penalties under Business and Professions Code sections §§ 17206, 17206.1,  
16 and 17536 for violating the Business and Professions Code as proven at trial.  
17 ii. The permanent removal of Defendants under Corporations Code section § 5223 as  
18 the Court deems appropriate.  
19 iii. A declaration of Plaintiff's "good faith" indemnification.  
20 iv. Plaintiff's costs of suit and other costs under Government Code section § 12598.  
21 v. A statement of determination of PCL's Board Election Validity under California  
22 Corporations Code section § 5716.  
23 vi. Any other relief that the Court deems just and equitable.  
24  
25

1           **PLAINTIFF TODD HILL VERIFIES THE TRUTH AND BELIEF IN THE TRUTH OF**  
2           **THOSE MATTERS DESCRIBED "UNDER PENALTY OF PERJURY" AND THEREFORE**  
3           **THIS COMPLAINT IS DEEMED VERIFIED UNDER THE PROVISIONS OF CODE OF**  
4           **CIVIL PROCEDURE SECTION 446.**

5  
6           Dated: March 31, 2025

7           Respectfully submitted,

8             
9

10           Todd R. G. Hill  
11           Pro Se Litigant

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1           **Plaintiff's Proof of Service**

2           This section confirms that all necessary documents will be properly served pursuant to L.R.  
3           5-3.2.1  
4  
5           Service. This document will be/has been electronically filed. The electronic filing of a document  
6           causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF  
7  
8           System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2)  
9  
10          all pro se parties who have been granted leave to file documents electronically in the case pursuant  
11          to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the  
12          CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by F.R.Civ.P. 4 or L.R. 79-  
13  
14          5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil  
15  
16          Procedure, and the NEF itself will constitute proof of service for individuals so served.

17           March 31, 2025

18  
19             
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21

22           Todd R. G. Hill

1                   **Affidavit of Todd R. G. Hill in Support of the Fourth Amended Complaint**

2 I, Todd R. G. Hill, being duly sworn, depose and state as follows:

3                   **PERSONAL BACKGROUND AND ENROLLMENT AT PCL**

- 4
- 5       1. I am over the age of 18, competent to testify, and make this affidavit based upon my  
6                   personal knowledge unless otherwise stated.
- 7
- 8       2. I am the Plaintiff in the case against Peoples College of Law (PCL), filed in the United  
9                   States District Court for the Central District of California.
- 10
- 11      3. I am a registered law student with the Texas and California State Bars. I am expected to  
12                   receive my J.D. from Purdue Law School in 2025.
- 13
- 14      4. The facts stated in this affidavit are true and correct to the best of my knowledge and belief.

15                   **BACKGROUND**

- 16
- 17      5. I was enrolled as a student at Peoples College of Law (PCL) and completed the required  
coursework for my degree.
- 18
- 19      6. PCL officials, including Ira Spiro and Christina Gonzalez, have engaged in various acts of  
misconduct, including but not limited to: a. Manipulating academic records and transcripts;  
b. Denying access to courses necessary for completion of the program; c. Implementing  
policies that obstructed my educational progress; d. Retaliating against me for  
whistleblowing about procedural deficiencies and fraud; e. Engaging in discriminatory  
practices, including preferential treatment of other students such as Nancy Popp, while  
denying me comparable accommodations.

7. PCL's misconduct has caused me significant harm, including delayed certification, reputational damage, emotional distress, and financial losses associated with my efforts to rectify their misconduct.

## RICO ALLEGATIONS

8. Since 2020, I have repeatedly requested accurate transcripts and academic records from PCL, specifically through email communications using my Gmail account (e.g., [toddryangregoryhill@gmail.com](mailto:toddryangregoryhill@gmail.com)). On multiple occasions I have paid fees to receive inaccurate transcripts.

9. PCL officials, including Ira Spiro, Adriana Zuniga and Roger Aramayo, have provided inaccurate transcripts on multiple occasions. For example, on or about June 15, 2022, I received a transcript from Ira Spiro via email, which falsely stated that I had not completed certain courses despite my submission of documentation proving completion.

10. I have also received communications via Gmail from PCL officials, including Roger Aramayo, that contained misleading statements about my academic standing. For instance, on October 14, 2023, Aramayo stated via email that the institution was unable to provide accurate transcripts due to administrative delays, despite having been provided with proof of course completion months earlier.

11. I have preserved copies of these email communications, which demonstrate intentional efforts by PCL officials to obscure or falsify my academic progress.

12. Additionally, PCL officials have repeatedly failed to correct errors in my transcripts even after acknowledging mistakes. Although I completed the totality of the required coursework for issuance of a degree, I was not issued a degree.

13. PCL's failure to correct transcripts has materially impaired my ability to apply for certification with the California State Bar and forced me to complete two years of additional

1 coursework at another institution at great personal and professional cost. Despite submitting  
2 completed coursework and proof of compliance, I was unable to obtain the necessary  
3 certifications to timely proceed.

4 14. As a result of these actions, I have suffered financial losses exceeding \$250,000 in  
5 tuition payments, lost work opportunity, reputational harm, and significant emotional distress  
6 from being unjustly obstructed from completing my legal education.

7 15. These actions form part of a continuous pattern of fraudulent conduct involving wire  
8 and mail communications to deny me access to the benefits and opportunities I am entitled to  
9 receive.

10 16. I have attached copies of relevant emails and transcripts demonstrating the specific  
11 instances of misconduct described above.

12 **UNRUH CIVIL RIGHTS ACT VIOLATIONS**

13 17. I have been subjected to discriminatory treatment by PCL on the basis of my race, which  
14 violates the Unruh Civil Rights Act, California Civil Code § 51.

15 18. Specific instances of discriminatory conduct include:

16 a. Refusal to correct erroneous transcripts despite my repeated requests;

17 b. Arbitrarily denying me access to courses necessary for graduation;

18 c. Retaliating against me for attempting to address these issues and for exercising my rights  
19 as a whistleblower.

20 19. Other students, including Nancy Popp, were promptly provided with corrections to their  
21 transcripts and accommodations that were denied to me.

1                   **NEGLIGENCE AND NEGLIGENCE PER SE**

- 2                   20. PCL and its agents failed to exercise reasonable care in maintaining accurate academic  
3                   records, providing required courses, and enforcing compliance with relevant regulations.  
4
- 5                   21. PCL's violations of statutory and regulatory standards contributed directly to my harm.  
6
- 7                   22. PCL's negligent conduct included: a. Issuing erroneous transcripts; b. Refusing to recognize  
8                   my completion of coursework despite documentation; c. Implementing policies that unjustly  
9                   obstructed my educational progress.
- 10                  23. PCL's charter was involuntarily revoked, effective May 31, 2024, which I believe is a result  
11                  that I reasonably believe would not have occurred in the absence of protracted negligence or  
12                  willful misconduct.

14                  **NEGLIGENT HIRING, RETENTION, AND SUPERVISION**

- 15                  24. PCL failed to adequately hire, train, supervise, and monitor its personnel, allowing  
16                  discriminatory and retaliatory practices to occur unchecked.
- 18                  25. I believe PCL had a duty to hire, supervise, and train its agents in a manner that ensured  
19                  their conduct conformed to institutional policies and applicable regulations. If agents failed  
20                  to comply, PCL was responsible for retraining them or terminating their employment or  
21                  engagement when necessary to maintain a lawful and compliant educational environment.
- 23                  26. PCL's failure to properly supervise its agents contributed directly to the harm I have  
24                  suffered.
- 26                  27. The failure to provide me with the fourth year of study as required by its own policies  
27                  further demonstrates negligent oversight.

1       28. PCL's negligence in hiring, retention, and supervision allowed employees and agents to  
2                  engage in misconduct that harmed me.  
3  
4 FURTHER AFFIANT SAYETH NOT.  
5  
6 I declare under penalty of perjury under the laws of the State of California that the foregoing is true  
7 and correct.  
8  
9 Executed on this 31<sup>st</sup> day of March 2025, at Belton, Texas.  
10  
11 Todd R. G. Hill  
Plaintiff, Pro Se Litigant  
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**TABLE OF EXHIBITS**  
2

3     **1. Exhibit 1: Spiro Letter and Transcripts**

4         Contains correspondence from Ira Spiro to Todd Hill, along with transcripts provided by PCL.  
5  
6         The transcripts show material errors, including incorrect unit allocations and missing required  
7         information. Spiro's communications fail to address these discrepancies despite multiple requests  
8         for correction.

9     **2. Exhibit 2: Popp Grievance Letter and 2020 Progress Report**  
10

11         Includes a formal grievance letter submitted by Nancy Popp to the PCL Board detailing  
12         inaccurate grading, lack of transparency in governance, and substandard instruction violating  
13         State Bar guidelines. Also includes a 2020 progress report by State Bar to PCL highlighting  
14         areas of non-compliance and failed attempts to remedy deficiencies.

15     **3. Exhibit 3: Profiles in Outcomes Report**  
16

17         A 2023 State Bar report titled "Profiling the Outcomes of the FYLSX" which details disparities  
18         in bar passage rates across racial demographics. This report demonstrates that prolonged education  
19         timelines significantly reduce the likelihood of bar passage for African American students,  
20         supporting Todd Hill's claims of systemic inequities.

22     **4. Exhibit 4: Email to Viramontes as Faculty Committee Chair Reviewing Student  
23              Handbook Changes (11242021)**

25         Correspondence from Kevin Clinton to Viramontes as Faculty Committee Chair addressing  
26         proposed changes to the PCL Student Handbook intended to suppress student grievances from  
27         reaching the State Bar. This demonstrates PCL's attempts to silence complaints and shield itself  
28         from external scrutiny.

1       **5. Exhibit 5: Spiro Exchange - Crediting Pay Against Tuition**

2           Emails between Todd Hill and Ira Spiro regarding an arrangement to credit Hill's work against  
3 his tuition fees. The exchange reveals inconsistencies in Spiro's accounting, resulting in breach of  
4 contract and overcharges of approximately \$2,400. Hill's efforts to clarify these discrepancies are  
5 obstructed by PCL administrators.

6       **6. Exhibit 6: Email Exchange from Spiro to State Bar (Leonard)**

7           Contains emails from Ira Spiro to Natalie Leonard of the State Bar discussing various issues but  
8 omitting known problems of incorrect unit awards on student transcripts. The correspondence  
9 demonstrates Spiro's awareness of compliance failures while misrepresenting PCL's operations to  
10 the State Bar. This document was produced by the State Bar of California in response to a  
11 California Public Records Act (CPRA) request. The relevant underlying facts, as contained within  
12 Exhibit C of Plaintiff's Motion to Supplement the Record (ECF 199), were judicially noticed in  
13 ECF 248 for the purpose of amending Plaintiff's complaint.

14       **7. Exhibit 7: Popp and Bell Election Committee Report**

15           A formal report detailing PCL's internal election process and related challenges to Todd Hill's  
16 candidacy. The report illustrates irregularities and attempts to invalidate Hill's position on the PCL  
17 Board through questionable review processes.

18       **8. Exhibit 8: Donor Call Squad Email (04282021)**

19           Exhibit 8 includes a series of emails related to PCL's fundraising activities and internal  
20 communications between administrators, including Hector Pena, Ira Spiro, Christina Gonzalez,  
21 and David Bouffard. The emails reveal inconsistencies between PCL's public fundraising  
22 promises—asserting that “100% of proceeds” would be used for student needs and underserved  
23 communities.

1 communities—and internal discussions suggesting potential misrepresentation or misuse of  
2 those funds. Additionally, the Bouffard emails include statements indicating that David  
3 Bouffard acted under the authority of then PCL President Hector Pena to block Todd Hill's  
4 Zoom access, preventing him from attending classes. The emails reflect broader governance  
5 issues and suggest retaliatory actions against Hill for his efforts to correct PCL's administrative  
6 deficiencies.  
7

8 **9. Exhibit 9: Email exchange between Sarinana and State Bar (Leonard)**

10 Correspondence from Sarinana to State Bar addressing ongoing administrative issues at PCL,  
11 including discrepancies in grade uploads and transcript management. The email underscores PCL's  
12 persistent non-compliance and administrative failures. This document was produced by the State  
13 Bar of California in response to a CPRA request. The relevant underlying facts, as contained within  
14 Exhibit C of Plaintiff's Motion to Supplement the Record (ECF 199), were judicially noticed in  
15 ECF 248 for the purpose of amending Plaintiff's complaint.  
16

17 **10. Exhibit 10: Chronological Timeline of PCL Defendants' Misconduct**

18 A detailed timeline from 2018 to 2024 summarizing key events and allegations involving  
19 PCL's misconduct, administrative failures, retaliatory acts, fraudulent schemes, and regulatory  
20 non-compliance. The timeline provides a comprehensive overview of Hill's grievances and  
21 PCL's pattern of misconduct.  
22

23  
24  
25  
26  
27  
28

EXHIBIT 1



Todd Hill <toddryangregoryhill@gmail.com>

## transcripts and units

1 message

**Ira Spiro** <ira@spirolawcorp.com> Tue, Aug 3, 2021 at 5:13 PM  
To: Nancy Popp <nopp@peoplescollegeoflaw.edu>, Anna Hawkins <pclhawkins@gmail.com>, "registrarguildlawschool@outlook.com" <registrarguildlawschool@outlook.com>, Todd Hill <toddryangregoryhill@gmail.com>, "Christina Gonzalez (christina.marin.gonzalez@gmail.com)" <christina.marin.gonzalez@gmail.com>

With regard to Nancy's insistence, in her emails below, that a "notation/attachment" be sent along with transcripts, at first I thought there would be no problem in sending a letter with content she wants. Then, earlier today, it occurred to me that I had best call the State Bar about it. I spoke to Natalie Leonard today. Then I wrote her a confirming email, as follows:

**From:** Ira Spiro  
**Sent:** Tuesday, August 3, 2021 4:39 PM  
**To:** Natalie Leonard (Natalie.Leonard@calbar.ca.gov) Natalie.Leonard@calbar.ca.gov  
**Subject:** RE: explanation to another law school of units on Peoples College of Law's transcripts

Dear Ms. Leonard

I'm writing to confirm information you gave me, this time in our telephone conversation of today, Tuesday, August 3, regarding Peoples College of Law (PCL).

I explained that I have been requested to send to another law school, along with students' transcripts, a notation or attachment explaining PCLs designation of quarter courses as 2 units, not three. I said I was thinking of a letter from me that would accompany the transcript rather than something attached to the transcript or written on it. I noted that our quarter courses are 10 weeks, with 3 hours of instruction per week. To use the words of the request I received, it was that the notation or attachment should state "the inconsistent listing of Semester Units for Quarter Classes and clarifying the correct Quarter Units (3.0) for each IL Course." (Note that I disagree with that quoted characterization.)

You explained that I, and Peoples College of Law should not send such a communication, because it could be interpreted as an improper solicitation, by PCL or me, of the other law school to credit the students with more units for the students' classes at PCL than the other law school would otherwise credit. You explained that for the other law school to do that would be a violation of State Bar rules.

You also explained that the communication could be considered an improper alteration of the transcript.

Sincerely,

*Ira Spiro,*

Thus, I will not send a notation or attachment or letter with content requested by Nancy, and in my opinion nobody else on behalf of PCL should do so.

Ira Spiro, Attorney at Law

310-235-2350

*Please Correspond by Email Only*

*I do not see Post Office Mail, FedEx, UPS, etc. promptly*

*Phone is land line, does not receive texts*

*Los Angeles, Cal.*

*ira@spirolawcorp.com*

*website: spiro/awcorp.com*

*pronouns: he*

---

**From:** Nancy Popp <npopp@peoplescollegeoflaw.edu>

**Sent:** Tuesday, August 3, 2021 9:02 AM

**To:** Ira Spiro <ira@spirolawcorp.com>; Anna Hawkins <pclhawkins@gmail.com>; registrarguildlawschool@outlook.com; Anna Hawkins <pclhawkins@gmail.com>; Todd Hill <toddryangregoryhill@gmail.com>; Christina Gonzalez (christina.marin.gonzalez@gmail.com) <christina.marin.gonzalez@gmail.com>

**Subject:** Re: transcript

Ira,

Please stop removing the PCL Community Members who are CC'ed.

I will repeat myself for a third time; please do NOT ask me to clarify again:

**Do NOT send an Official Transcript to NWU before sending me the Transcript with the Notation/Attachment addressing the Unit issue included for my review.**

This is a serious error that reflects on the dysfunction of PCL as an institution; not on me as a student. I will communicate with NWU if needed. The duty of PCL Administrators is to send out accurate student records (or as near as accurate as possible).

To that end, the Notation/Attachment MUST be included, and it MUST be accurate in describing the failure of PCL to ascribe correct Quarter Units for all quarter classes.

Please stop making excuses and delays; simply do the right and ethical thing.

--  
Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Tuesday, August 3, 2021 8:54 AM  
**To:** Nancy Popp <nopp@peoplescollegeoflaw.edu>  
**Subject:** RE: transcript

You're right, I didn't realize you didn't want the transcript to go out without the explanation about units. Nancy, are you sure that's the way you want it? Some have pointed out that the recipient school probably would not be concerned about the units but the explanation might cause them to become concerned. We sent a transcript without an explanation to NW Cal several months ago for another student, and we heard nothing back from the student or NW Cal about the units or anything else about the transcript. I think the student or Anna or someone would have contacted me if the school did raise a concern with the transcript.

Anyway, I'll send it with or without the explanation - your choice.

Ira Spiro

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---

**From:** Nancy Popp <nopp@peoplescollegeoflaw.edu>  
**Sent:** Monday, August 2, 2021 10:55 PM  
**To:** Ira Spiro <ira@spirolawcorp.com>  
**Cc:** registrarguildlawschool@outlook.com; Anna Hawkins <pclhawkins@gmail.com>; Christina Gonzalez (christina.marin.gonzalez@gmail.com) <christina.marin.gonzalez@gmail.com>; Todd Hill <toddryangregoryhill@gmail.com>  
**Subject:** Re: transcript

Ira, I am not sure you read my reply.

To repeat my answer to your question, do NOT send an Official Transcript to NWU before sending me the Transcript with the Notation/Attachment addressing the Unit issue included for my review.

--  
Nancy Popp

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Monday, August 2, 2021 9:16 PM  
**To:** Nancy Popp <nopopp@peoplescollegeoflaw.edu>  
**Subject:** RE: transcript

Thanks for that email, Nancy. My plan is to send your transcript, showing 2 units for quarters, to NW Cal tomorrow, Tuesday.

*Ira Spiro*

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---

**From:** Nancy Popp <nopopp@peoplescollegeoflaw.edu>  
**Sent:** Monday, August 2, 2021 6:57 PM  
**To:** Ira Spiro <ira@spirolawcorp.com>; registrarguildlawschool@outlook.com; Anna Hawkins <pclhawkins@gmail.com>  
**Subject:** Re: transcript

Ira,

Please keep the email responses to my Transcript Request in the same thread, for clarity and to prevent miscommunication.

I would prefer an accurate Official Transcript; however, the fact is that the Official Transcript to NWU needs to be mailed out as soon as possible.

As I stated in my email of 12:47pm today:

*I suggest Rebecca as Admin/Registrar work harmoniously with Brian, Anna and other former PCL registrars to draft an appropriate Letter to accompany ALL student transcripts and start the application to the CA State Bar immediately to make the change. This can be done diligently without panic or any created conflict or drama.*

Transcript Requests must be filled accurately and promptly within a reasonable time. I understand the problems with inaccuracies in PCL Transcripts are long-standing over many years, were overlooked and not corrected, and now require CBE applications and processes to correct them. Again, those processes must begin immediately without delay.

In the meantime, each PCL Student Transcript will need a notation on the Transcript stating the inconsistent listing of Semester Units for Quarter Classes and clarifying the correct Quarter Units (3.0) for each 1L Course.

Thank you,

---

Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Monday, August 2, 2021 1:02 PM  
**To:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Subject:** FW: No changes in transcript units or course unit s-- per State Bar

Nancy, in view of all this, I plan now to send your transcript to NW Cal showing a quarter course as 2 units, i.e. as attached.

**Please let me know today if you want me NOT to do that.**

*Ira Spiro*

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---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Monday, August 2, 2021 12:37 PM  
**To:** Nancy Popp <npopp@peoplescollegeoflaw.edu>; registrarguildlawschool@outlook.com <registrarguildlawschool@outlook.com>; Anna Hawkins <pclhawkins@gmail.com>  
**Subject:** RE: transcript

Nancy, I left you a voicemail about this just now, so please give me a call. I was told by the State Bar just now in very strong terms that I must not make this change in your transcript, or anyone's transcript, that it would be a retroactive change, which is not permitted. I was also told that for PCL to change the units for a quarter from 2 to 3 would be considered a "major change" under State Bar rules, which means PCL would have to apply to the Committee of Bar Examiners for the change.

BUT, I certainly could write a letter to go along with your transcript, any transcript, to explain the meaning of the 2 units per quarter, and anything else so long as it's true.

*Ira Spiro, Attorney at Law*

310-235-2350

***Please Correspond by Email Only***

Phone is land line, does not receive texts

Los Angeles, Cal.

ira@spirolawcorp.com

website: spirolawcorp.com

pronouns: he

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---

**From:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Sent:** Monday, August 2, 2021 11:27 AM  
**To:** Ira Spiro <ira@spirolawcorp.com>; registrarguildlawschool@outlook.com; Anna Hawkins <pclhawkins@gmail.com>  
**Subject:** Re: transcript

Thank you for changing all the needed values for units. This transcript appears to be correct.

Please confirm when the official corrected transcript is mailed to NWU.

---

Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Monday, August 2, 2021 10:57 AM  
**To:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Subject:** RE: transcript

Nancy, I had to change your transcript by hand, i.e. with the pdf editing function. The result is attached. Let me know if the attached is OK with you, and if so I'll go ahead and sign it.

I believe I couldn't change it in Populi because I would have had to change the units for all first year students, and PCL hasn't decided to do that.

It's not just the units per course that had to be changed. Also changed are:

- "earned credits" per course per quarter
- total earned credits per course per quarter

- "points" per course per quarter
- total points per quarter
- total earned credits for the academic year (at the bottom)
- total points for the academic year (also at the bottom)

Of course the GPA didn't change.

Thanks for telling me about Rebecca's email address.

*Ira Spiro, Attorney at Law*

310-235-2350

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---

**From:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Sent:** Monday, August 2, 2021 10:30 AM  
**To:** Ira Spiro <ira@spirolawcorp.com>  
**Cc:** Rebecca Hirsch (PCLregistrar@peoplescollegeoflaw.edu) <PCLregistrar@peoplescollegeoflaw.edu>; registrarguildlawschool@outlook.com; Anna Hawkins <pclhawkins@gmail.com>; Brian Godfrey (cityoffantastic@yahoo.com) <cityoffantastic@yahoo.com>; Ira Spiro <ira@spirolawcorp.com>; Todd Hill <toddryangregoryhill@gmail.com>; Christina Gonzalez (christina.marin.gonzalez@gmail.com) <christina.marin.gonzalez@gmail.com>  
**Subject:** Re: transcript

Thank you very much Ira, I appreciate it.

It's also fine to include a Note on the actual transcript explaining the assignment of credits, if that sounds appropriate to you. It might not be a bad idea to do that on PCL transcripts overall, actually.

FYI, Rebecca's 'PCLregistrar@peoplescollegeoflaw.edu' email address is regularly bouncing back.

--  
Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Monday, August 2, 2021 10:19 AM  
**To:** Nancy Popp <nopopp@peoplescollegeoflaw.edu>  
**Subject:** RE: transcript

Sure, I'll change it if I can. I'll try right now. I believe I can change it, and I'll let you know right away if there's a problem in doing so.

I don't think the number of units for quarter courses needs changing from 2 to 3 on any transcript, in part because as you can see on your transcript, the correct number of hours, the hours required by the State Bar, is shown near the bottom, but I'll go ahead and change yours and send it to you.

*Ira Spiro, Attorney at Law*

310-235-2350

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*pronouns: he*

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---

**From:** Nancy Popp <nopopp@peoplescollegeoflaw.edu>  
**Sent:** Monday, August 2, 2021 10:06 AM  
**To:** Ira Spiro <ira@spirolawcorp.com>  
**Cc:** pclregistrar@peoplescollegeoflaw.edu; registrarguildlawschool@outlook.com; Anna Hawkins <pchlawhawkins@gmail.com>; Brian Godfrey (cityoffantastic@yahoo.com) <cityoffantastic@yahoo.com>; Ira Spiro <ira@spirolawcorp.com>; Todd Hill <toddryangregoryhill@gmail.com>; Christina Gonzalez (christina.marin.gonzalez@gmail.com) <christina.marin.gonzalez@gmail.com>  
**Subject:** Re: transcript

Ira, based on the concerns that Todd Hill has raised on how PCL assigns credit for Quarter classes, it appears my credits on this transcript are incorrect.

One quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per week for ten (10) weeks equals one quarter unit of credit.

Based on this, each PCL Quarter Class would result in 3.0 Quarter credits per class, since we are in-class 3 hours/week for 10 weeks. These are Quarter credits, as clearly shown in the transcript, not Semester credits.

One semester credit is equivalent to 1.5 Quarter credits, and the Bar is aware of this. It is important that PCL transcripts reflect the correct credits as assigned by the CBE and used by the vast majority of law schools (unaccredited and accredited). It does not make sense, nor is it practical, to hold Quarter Courses and assign Semester Credits to those courses; this will only confuse other schools who review PCL's transcripts. Accuracy is extremely important so that all PCL Students receive proper credit for their work.

Please correct the assignment of credits per class in my transcript to 3 Quarter Units per class before sending it to NWU. Please send me a corrected copy of my unofficial transcript for review prior to sending a corrected official copy.

Thank you,

--  
Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Nancy Popp <nopp@peoplescollegeoflaw.edu>  
**Sent:** Thursday, July 29, 2021 3:34 PM  
**To:** Ira Spiro <ira@spirolawcorp.com>  
**Cc:** pclregistrar@peoplescollegeoflaw.edu <pclregistrar@peoplescollegeoflaw.edu>; registrarguildlawschool@outlook.com <registrarguildlawschool@outlook.com>; Anna Hawkins <pchlaws@gmail.com>  
**Subject:** Re: transcript

Ira,

Thank you for processing my request for an official transcript promptly. I have emailed Rebecca Hirsch twice directly about obtaining my transcript but have not received a reply from her.

I have reviewed the Transcript and do not see any errors; all the information appears to be correct.

Yes, I am aware that Rebecca has not been available for Registrar Training; as a result, Anna has the PCL Seal and letterhead in her possession.

I'm sure Anna would be willing to stamp and print my official transcript given adequate notice; she's been very supportive of students and generous in helping out while there is still a gap in filling her role and duties at PCL.

PLEASE NOTE- the Official Transcript must be mailed to NWC, they do not accept electronic transcripts.

Thank you,

Nancy Popp

People's College of Law, 1L ('24)

---

**From:** Ira Spiro <ira@spirolawcorp.com>  
**Sent:** Thursday, July 29, 2021 10:12 AM  
**To:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Subject:** transcript

Nancy, I generated your transcript just now from Populi. It had Anna's signature on it, and that isn't right for a transcript now, so I changed it to mine.

**PLEASE EMAIL ME BACK, telling me if you think there are errors in the attached transcript, or if you think it's OK.**

I don't want to send an erroneous I believe there have been erroneous entries into Populi that could affect transcripts.

The transcript can't be sent out because Anna has at her home the materials necessary to do it, the seal and the special transcript paper. We can't get them from her till Friday. She wrote that she's not available today.

*Ira Spiro, Attorney at Law*

*310-235-2350*

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*pronouns: he*

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# People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:  
213 483-0083 Fax: 213 483-2981  
E-mail: [administrator@peoplescollegeotlaw.edu](mailto:administrator@peoplescollegeotlaw.edu)  
*"Over 48 Years of Educating People's Law School"*

Hector C. Pefia, J.D. - President

Pascual J. Torres, Esq. - Dean

September 2, 2022

Nathalie Hope  
Program Specialist  
Office of Admissions  
State Bar of California  
845 S. Figueroa St.,  
Los Angeles, CA 90017

## RE: Todd Hill

Dear Nathalie Hope,

Enclosed if the official application in connection with the application for evaluation sent by PCL on September 2, 2022.

If you have any questions please don't hesitate to give us a call.

J.D  
President and Chair of the Board  
People's College of Law

# Peoples College of Law

## Official Transcript

660 S Bonnie Brae, Los Angeles, CA 90057

Phone: (213)483-0083, Fax:

**RECIPIENT:**

Nathalie Hope  
State Bar of California  
845 S Figueroa St  
Los Angeles, CA 90017

**STUDENT:**

Hill, Todd  
Student ID: 007-2019  
SSN (Last 4): :XXXXX183 I  
Enrollment Date: Sep 3, 2019  
Previous Degree(s): BA

**Degrees/Certificates**

Juris Doctorate

Pursuing as of 9/3/2019

**Transcript**

2019–2020: Fall Quarter- 09/03/2019- 11/15/2019

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONTI	Contracts I	30.00	3.00	A	12.00
LEGAL	Legal Writing I	30.00	3.00	A-	11.00
WRTGI					
TORTI	Torts I	30.00	3.00	A-	11.00
<b>Totals</b>		<b>90.00</b>	<b>9.00</b>	<b>Term GPA: 3.80</b>	<b>Cwn. GPA: 3.80</b>

2019–2020: Winter Quarter- 11/18/2019- 02/21/2020

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONTI	Contracts II	30.00	3.00	A	12.00
CRIM LI	Criminal Law I	30.00	3.00	G	5.10
LEGAL	Legal Writing II	30.00	3.00	8+	9.90
WRTGII					
TDRII	Torts II	30.00	3.00	8-	8.10
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Term GPA: 2.93</b>	<b>Cwn. GPA: 3.30</b>

2019–2020: Spring Quarter - 03/02/2020 - 05/15/2020

Course#	Name	Earned Hours	Earned Units	Grade	Points
CDNfill	Contracts III	30.00	3.00	A	12.00
CRIMLII	Criminal Law II*	30.00	3.00	A-	11.00
LEGAL	Legal Writing III	30.00	3.00	A	12.00
WRTGIII					
TORTm	Torts III*	30.00	3.00	A-	11.00
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Term GPA: 3.85</b>	<b>Cwn. GPA: 3.50</b>

2020-2021: Fall Quarter - 08/31/2020 - 11/13/2020

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONSTLI	Constitutional Law I*	30.00	3.00	A-	11.00
CRIM PROC I	Criminal Procedure I*	30.00	3.00	A-	11.00
TRIAL	Trial Advocacy	30.00	3.00	p	-
ADVOC					
<b>Totals</b>		<b>90.00</b>	<b>9.00</b>	<b>Term GPA: 3.70</b>	<b>Cwn. GPA: 3.53</b>

2020-2021: Winter Quarter- 11/14/2020- 02/20/2021

Course#	Name	Earned Hours	Earned Units	Grade	Points
CDNSTLII	Constitutional Law II*	30.00	3.00	A	12.00
CRIMPDOC	Criminal Procedure II*	30.00	3.00	A+	12.90
REMI	Remedies I*	30.00	3.00	C	6.00
WILLS/TRI	Wills & Trusts*	30.00	3.00	8-	8.10
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Term GPA: 3.25</b>	<b>Cwn. GPA: 3.46</b>

2020-2021: Spring Quarter - 03/01/2021 - 05/14/2021

Course#	Name	Earned Hours	Earned Units	Grade	Points
CDNST L III	Constitutional Law III*	30.00	3.00	A	12.00

•LEGALR.E.S Legal Research	30.00	3.00	P	
REM II Remedies II*	30.00	3.00	D+	3.90
WILLSffRII Wills & Trusts JI*	30.00	3.00	B	9.00
<b>Totals</b>	<b>120.00</b>	<b>12.00</b>	<b>Tenn GPA: 2.77</b>	<b>Cum. GPA: 3.36</b>

**2021-2022: Fall Quarter - 08/30/2021 - 11/13/2021**

Course#	Name	Earned Hours	Earned Units	Grade	Points
BUSN	Business Transactions Clinical Course	30.00	3.00	B+	9.90
TRANS					
CLINIC					
CIVPROCJ	Civil Procedure I*	30.00	3.00	A+	12.90
EVIDI	Evidence I*	30.00	3.00	A-	11.10
REAL PROP I	Real Property I*	30.00	3.00	B+	9.90
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Tenn GPA: 3.65</b>	<b>Cum. GPA: 3.41</b>

**2021-2022: Winter Quarter- 11/15/2021 - 02/19/2022**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC II	Civil Procedure II*	30.00	3.00	A+	12.90
CORP & BUS	Corporations & Business Associations*	30.00	3.00	B	9.00
ASSOC					
EVIDII	Evidence II*	30.00	3.00	A-	11.10
REALPROP	Real Property II*	30.00	3.00	C	6.00
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Term GPA: 3.25</b>	<b>Cum. GPA: 3.39</b>

**2021-2022: Spring Quarter- 02/28/2022 - 05/14/2022**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC III	Civil Procedure III*	30.00	3.00	C-	5.10
CMTY PROP	Community Property*	30.00	3.00	C-	5.10
PROFL RESP	Professional Responsibility*	30.00	3.00	D	3.00
REAL PROP	Real Property III *	30.00	3.00	C+	6.90
III					
REM II	Remedies II*			AUD	
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Tenn GPA: 1.68</b>	<b>Cum. GPA: 3.17</b>

**Cumulative**

	Earned Hours	Earned Units	Points	GPA
Resident	1,020.00	102.00	304.50	3.17
Transfer	0.00	0.00	0.00	0.00
Overall	1,020.00	102.00	304.50	3.17

(1) One semester unit is defined as fifteen (15) hours of classroom instruction. Generally, one hour of instruction per week for fifteen (15) weeks equals one semester unit of credit.

(2) One quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per week for ten (10) weeks equals one quarter unit of credit.

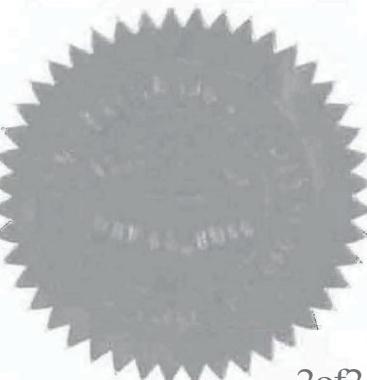
AUD= Audit  
FN = Failure for non-attendance  
I = Incomplete  
IP = In Progress  
R= Retake  
W= Withdraw

FYLS Information  
Date(s) Taken: -  
Date Passed: -

CBE Information  
Date(s) Taken: -  
Date Passed: -



Adriana Zuniga Nuñez - Registrar



# Peoples College of Law

## Official Transcript

660 S. Bonnie Brae, Los Angeles, CA 90057  
Phone: (213)483-0083, Fax:

**RECIPIENT:**
**STUDENT:**

Hill, Todd  
Student ID: 007-2019  
SSN (Last 4. i. J.: ---  
Enrollment Date: Sep 3, 2019  
Previous Degree(s): 8 A

**Degrees/Certificates**

Juris Doctorate  
Pursuing as of 9/3/2019

**Transcript**

**2019-2020: Fall Quarter- 09/03/2019 - 11/15/2019**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONTI	Contracts I	30.00	3.00	A	1200
LEGAL	Legal Writing I	30.00	3.00	A-	1110
WRTGI					
TORTI	Torts I	30.00	3.00	A-	II.ID
<b>Totals</b>		<b>90.00</b>	<b>9.00</b>	<b>Tenn GPA: J.80</b>	<b>Cum. GPA: 3.80</b>

**2019-2020: Winter Quarter- 11/18/2019 - 02/21/2020**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONTII	Contracts II	30.00	3.00	A	1200
CRIMLI	Criminal Law I	30.00	3.00	B+	5.10
LEGAL	Legal Writing II	30.00	3.00	8+	9.90
WRTGII					
TORTII	Torts II	30.00	3.00	B,	8.10
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Tenn GPA: 2.93</b>	<b>Cum. GPA: 3.30</b>

**2019-2020: Spring Quarter- 03/02/2020- 05/15/2020**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONT III	Contracts III	30.00	3.00	A	1200
CRJM L II	Criminal Law II*	30.00	3.00	A-	II.IO
LEGAL	Legal Writing III	30.00	3.00	A	1200
WRTG III					
TORTm	Torts III*	30.00	3.00	A-	II.IO
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Tenn GPA: 3.85</b>	<b>Cum. GPA: 3.30</b>

**2020-2021: Fall Quarter - 08/31/2020 - 11/13/2020**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONST LI	Constitutional Law I*	30.00	3.00	A-	1110
CRJM PROC	Criminal Procedure I*	30.00	3.00	A-	1110
TRIAL	Trial Advocacy	30.00	3.00	p	
ADVOC					
<b>Totals</b>		<b>90.00</b>	<b>9.00</b>	<b>Tenn GPA: 3.70</b>	<b>Cum. CPA: 3.53</b>

**2020-2021: Winter Quarter- 11/14/2020- 02/20/2021**

Course#	Name	Earned Hours	Earned Units	Grade	Points
CONST L II	Constitutional Law II*	30.00	3.00	A	1200
CRIMPROC	Criminat Procedure II*	30.00	3.00	A+	1290
REM!	Remedies I*	30.00	3.00	C	6.00
WJLLS/fR I	Wills & Trusts*	30.00	3.00	8-	8.10
<b>Totals</b>		<b>120.00</b>	<b>12.00</b>	<b>Trnn GPA: 3.25</b>	<b>Cum. GPA: 3.46</b>

**2020-2021 Spring Quarter- 03/01/2021 - 05/14/2021**

Course I	Name	Earned Hours	Earned Units	Grade	Points
CONST L III	Constitutional Law III*	30.00	3.00	A	1200

LEGAL RES	Legal Research	30.00	3.00	P	
REMH	Remedies I*	30.00	3.00	I)1-	3.90
WILLS/fR	Wills & TILSs II*	30.00	3.00	B	9.00
Totals		120.00	1200	Term GPA: 2.77	Cum.GPA:3.36

2021-2022: Fall Quarter - 08/30/2021 - 11/11/2021

Course#	Name	Earned	Hours	Earned	Units	Grade	Points
BUSN	Business Transactions Clinical Course		30.00		3.00	B+	9.90
TRANS							
CLINIC							
CIVPROC I	Civil Procedure I*		30.00		3.00	A+	12.90
EVIDI	Evidence I*		30.00		3.00	A-	11.10
REAL PROP I	Real Property I*		30.00		3.00	B+	9.90
Tdals			120.00		1200	Term GPA: J.65	Cum. GPA: 3.41

2021-2022: Winter Quarter - 11/15/2021 - 02/19/2022

Course#	Name	Earned	Hours	Earned	Units	Grade	Points
C N PROC II	Civil Procedure II*		30.00		3.00	A+	12.90
CORP & BUS	Corporations & Business Associations*		30.00		3.00	B	9.00
ASSOC							
EVIDII	Evidence II*		30.00		3.00	A-	11.10
REAL PROP II	Real Property II*		30.00		3.00	C	6.00
Totals			110.00		1200	Term GPA: 3.25	Cum. GPA: 3.39

2021-2022: Spring Quarter- 02/21/2022 -D5/14/2022

Course#	Name	Earned	Hours	Earned	Units	Grade	Points
CIV PROC III	Civil Procedure III*		30.00		3.00	C-	5.10
CMTY PROP	Community Property*		30.00		3.00	C-	5.10
PROFL RESP	Professional Responsibility*		30.00		3.00	D	3.00
REAL PROP III	Real Property III*		30.00		3.00	C+	6.90
REMH	Remedies II*		-		-	AUD	-
Totals			120.00		1200	Term GPA: 1.68	Cum.GPA:3.17

**Cumulative**

	Earned	Hours	Earned	Units	Points	GPA
Resident		1,020.00		102.00	304.50	3.17
Transfer		0.00		0.00	0.00	0.00
Ovtcl		1,020.00		102.00	304.50	3.17

(1) One semester, unit is defined as fifteen (15) hours of classroom instruction. Generally, one hour of instruction

\*(1) week for fifteen (15) weeks except one semester WJ. of audit

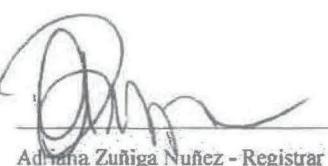
(2) One quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per

week for ten (10) weeks except one quarter unit of audit

AUD=Audit  
FN = Failure for non-attendance  
I=Incomplete  
P=In Progress  
R=Retake  
W=Withdraw

FYLS Information  
Date(s) Taken: -  
Date Passed: -

CBE Information  
Date(s) Taken: -  
Date Passed: -



Adriana Zuniga Nuñez - Registrar



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EXHIBIT 2

## FORMAL LETTER of GRIEVANCE

TO: People's College of Law, Board of Directors  
FROM: Nancy Popp, 1L '24  
DATE: June 15<sup>th</sup>, 2021

### **RE: Serious Topics of Concern in the Functioning of People's College of Law**

To the PCL Board, all Committee and Community Members:

I am taking the time away from my study and preparation for the First Year Law Student Exam to write this grievance because of the high level of my concerns for the functionality of People's College of Law (PCL).

I am considering whether I want to continue my law studies at PCL in light of the high degree of dysfunction of school governance, lack of clear structure and effectiveness in the day-to-day operations of the school, inconsistent standards of instruction and course rubrics, and a general lack of regard for the students, 1L's in particular.

I understand this has been a particularly challenging year. The COVID pandemic's effect on the PCL Community (financial stress, illness, general anxiety and quarantine fatigue), the resulting transition to all-online instruction, the death of Board Member and 3L Robert Wymss and the departure of additional PCL Board Members have all had enormous impact the functioning of the school.

While these pandemic pressures have aggravated the issues addressed in this Grievance, most are long-term problems that have persisted since PCL was re-established in 2015.

I have reviewed the CA State Bar's Report on PCL (Agenda Item O-402 for the CBE Meeting Date June 18<sup>th</sup>, 2021) and its recommendations for Compliance with CA State Bar Guidelines; it is clear there are numerous overlapping and ongoing with this Grievance which still need addressing. It is past time to identify them at the source, to enable our school to function as the Cooperative Community Educational Institution it was intended to be by its founders.

#### **1. Tuition Collection/Methods of Discipline to Collect**

PCL issues Tuition Invoices at the start of each Quarter (Fall, Winter, Spring). Accountability Fees are due in the Spring Quarter and are offset by time volunteered at the school. Upon the end of the Winter 2020 Quarter 1L grades were inaccurate and incomplete due to an instructor not turning in grades for the course.

As of April 2021 2Q grades remained incomplete. I wrote an email to Dean Spiro on April 8<sup>th</sup> stating,

*"I'll be glad to pay my 3Q tuition as soon as all accurate 2Q grades are received."*

On May 11<sup>th</sup> I received an email from the PCL Administrator stating that the Treasurer and Dean were inquiring about tuition owed. When I inquired about the missing 2Q grades, Dean Spiro emailed me on May 17<sup>th</sup> stating,

*"Once the grades for winter and spring quarters are posted, our rules require that you pay the tuition, or have a payment plan, before PCL will send to the Bar your certification to take the FYSLX."*

I replied to Dean Spiro on May 18<sup>th</sup>:

*"As soon as the grades are completed, please let me know. I'll keep an eye out and pay tuition promptly. Again, I fully understand the difficulty involved and very much appreciate everyone's efforts, including yours Ira. However, please don't penalize me for a tight turnaround that is not in my control. It's clear that grading will likely go right up to the certification deadline. I feel strongly that any rules must be adhered to equally by all parties, and not selectively applied; otherwise, hypocrisy results and trust breaks down."*

I take issue with the school's Dean stating they would withhold my certification for the FYSLX due to tuition being owed; particularly in light that my tuition was being withheld due of PCL's failure of their duty to provide grades in a reasonable and/or timely manner.

The CA State Bar's Rules for Unaccredited Law Schools state:

Division 2, Honesty & Integrity

**2.2 Honesty Regarding Finances.**

**(A) Honesty in Financial Affairs Generally.**

*A law school must conduct its financial affairs honestly and in a forthright manner. Financial considerations must not adversely affect a law school's educational program, admission and academic decisions, or academic standards.*

**2.8 Fairness in Student Discipline**

*A law school must have a written policy for the imposition of student discipline and that policy must be fair.*

*(D) The law school's imposition of student discipline policy does not apply to academic probation or disqualification; other failures to meet academic standards; or to failure to pay tuition, fees, or charges billed to the student.*

Inhibiting a 1L from moving ahead to their 2L year harms the school by preventing students from advancing and creates even greater attrition than is already occurring at PCL. Student attrition is both a fiscal problem and a symbolic failure of the school's ability to achieve its goals and purpose. In 2020-21 nearly half (6 out of the original 14 students, or 43%) of PCL's 1Ls withdrew or declined to take the FYLSX to allow them to advance to their 2L year. It is a violation of the CA State Bar's Guidelines to discipline a student by withholding grades or certification for a First Year Law Student Exam due to tuition owed.

I am aware that these threats of discipline due to non-payment of tuition have occurred with multiple students at PCL; this indicates a serious pattern of behavior that violates CA State Bar guidelines, which must be addressed and must cease immediately.

**2. Transparency of PCL Structures/Administration**

When I informed PCL's Board President that I was in the process of writing this Formal Grievance, I inquired as to where and to whom it should be communicated and sent. A conversation revealed that there is not a transparent structure of PCL Committees or Members of those Committees.

The PCL Bylaws, ratified May 22<sup>nd</sup> 2017, list five 'regular and standing Committees': Admissions/Recruitment, Faculty Curriculum, Finance/Fundraising, Building/Library and Accountability and an Elections Committee on an as-needed basis. PCL Committees are set up on the school's online platform Populi. However, not all Committees are represented; of the above five standing Committees, only Admissions/Recruitment, Building/Library and Accountability and the Faculty Curriculum Committee (FCC) are represented in Populi.

The Board of Directors Populi Group, which exists, is not publicly listed or able to be contacted through Populi. Most Committees do not list their members; it is not possible to discover who sits on which Committees or how to contact the members directly. If a student has questions regarding the governance of the school, or who is making decisions about Curriculum, Faculty, Finances or other decision-making bodies whose decisions directly impact students, there is little to no clarity or transparency about who to contact or how to reach them. It is for this very reason that 3L Kevin Clinton took the step of emailing the broader PCL Community on May 25<sup>th</sup> a sincere effort to raise the alarm regarding violations of the CA State Bar Guidelines for back tuition and disciplinary procedures (see item 1, *Supra*).

PCL's day-to-day operations are highly dysfunctional; the current Board, Dean and Committees do not share information openly, seemingly commit to tasks but do not follow through, and waste energy on conflict and infighting. It is my belief that the majority of the PCL community are still traumatized from the time of the 'takeover' five years previously, and are continuing to enact this dysfunction in their relations amongst one another, creating problems instead of simple, effective functional structures and solutions. Many Board and Committee Members have left PCL in the past two years due to their unwillingness to engage in these hostile exchanges, leaving too few people for the tasks at hand; a handful of individuals are making the majority of the decisions with very little transparency.

The Executive Committee (EC) is a key example of this lack of transparency. Although this Committee was established by a vote during a Board of Directors meeting in 2017, its role is unclear and its members are not made public. The current PCL Student Handbook states that payment plans for back tuition owed must be approved by the EC; also, that changes to student transcripts must be approved by the EC. Students appealing Academic Disqualification and Student Grievances must be reviewed by the EC. PCL's Student Handbook states that "...*the Community Board may delegate some or all of its functions to the Executive Committee...*". Students with ADA Requests for Accommodations also are reviewed by the EC; student Disciplinary Procedures are imposed by the EC, which also coordinates Adjudicatory Hearings, disqualifies Members of a Hearing Panel, and handles Appeals for Admission to PCL. Although the PCL Student Handbook states that members of the EC shall be specified in the PCL Bylaws, the Bylaws ratified May 22<sup>nd</sup> 2017 make no mention of this Committee, its role, duties, members or functions. Nor is there any Populi Group for the Executive Committee, or any way for students to contact its members.

On June 3<sup>rd</sup>, in response to a written request I sent to Dean Ira Spiro for more transparency and information on the Executive Committee, he replied in part:

*"...the Bylaws don't mention the Executive Committee, but one amendment does affect it, an amendment stating that the Dean is an Officer, attached. As far as I know the Executive Committee doesn't do day-to-day accounting of student accounts or tuition...the Executive Committee has charge of payment plans and the Treasurer is a member of the Executive Committee."*

The CA State Bar's *Rules for Unaccredited Law Schools* state:

**Division 2, Honesty & Integrity**

**2.1 Honesty and Integrity.**

*A law school must be honest and forthright in all of its activities. A law school must establish and maintain procedures and practices that demonstrate an on-going commitment to ensuring that every law school activity is conducted honestly and in a forthright manner.*

The current functions and operations of the Executive Committee are in violation of the CA State Bar's Guidelines for Unaccredited Law Schools.

**Proposal:**

The Executive Committee must operate under full transparency with all members identified, and clear guidelines established for its role, duties and functions. If there is no will to do so by the Board of Directors or the Executive Committee members, the Executive Committee must be disbanded.

**3. Accurate, Consistent Standards of Instruction/Grading**

During my 1L year, I noticed varying standards of instruction and preparation among my professors; this ranged from highly prepared, with clear explanations of concepts and rules, regular reviews of lecture material, use of the Populi and MS Teams online platforms fully and effectively, and use supplemental material, including homework assignments that led to mastery of the material; to lack of preparation in which lectures consisted of reading straight from the textbook week after week.

Three-quarters of the instructors submitted grades within a reasonable time (2 weeks); one instructor, James Simmons, did not submit final grades for his Criminal Law course for either 2Q or 3Q (as was also the case with his 2020-21 Torts course); his partially completely grades were widely disparate from other 1L course grades. Numerous Board and Faculty Members stepped in to re-evaluate and complete the grading. Another example of long-delayed grades was a very academically strong 1L's decision to withdraw from the school in April, well into 3Q; they did not receive grades for the coursework they completed in a timely manner. The student had to threaten to contact the CA State Bar to receive official transcripts of their completed coursework.

The CA State Bar's *Rules for Unaccredited Law Schools* state:

**Division 5, Academic Programs and Scholastic Standards**  
**5.17 Grading Standards**

A law school must adopt written grading standards that ensure accuracy, validity, reliability, and consistency in the evaluation of student performance. Each student must be graded honestly and realistically. Qualified and competent individuals, whether they are course instructors, other members of the faculty, or carefully selected and supervised graders, must evaluate student performance. There should be a reasonable correlation among the grades of all instructors teaching the same group of students. A wide disparity in the grades among several instructors teaching the same group of students is *prima facie* evidence of inadequate grading standards. Reasonableness in correlation may include due regard for variation in subject matter difficulty.

I understand that PCL historically struggles with recruiting and retaining reliable instructors, given they volunteer their time. Based on my experience, this problem is also due to a lack of organization and clear expectations, which requires willingness and capacity to do so at the Board level. Given that James Simmons was invited back to teach when he previously failed to submit grades the year prior reflects a failure on the part of the Board, or at best, a serious lack of judgment.

**Proposal:**

Since grades and transcripts are crucial to the functioning of a school, I propose PCL instructors be paid a small stipend per class only to grade students work and submit grades, not for teaching. This symbolic gesture would create a clear expectation for evaluating student's work promptly and submitting it in a reasonably timely manner at the end of each Quarter. A grading stipend would also create a contractual expectation between the instructor and the school, and encourage volunteer professors to view their promise as a professional commitment. PCL Board Members and Administrators must be consistent in adhering to the standard of professional conduct with PCL Instructors, and support them in meeting those standards, rather than undermining them or encouraging continued violations CA State Bar Guidelines by literally rewarding such conduct.

**4. 1L Courses/Rubrics to be FYLSX Focused**

I attended the February 2021 Board Meeting to voice my concerns about the manner in which the 1L courses were being taught at PCL. I described how half of the 1L instructors structured their courses with a focus on passing the FLYSX, while others were unaware of the exam's importance to 1L's as a mandatory hurdle to continuing their studies at PCL, or at any other law school. The point of my concerns was the necessity of mandating all 1L Professors teach to the FYLSX, use consistent methodologies of focusing on Essay Writing and MBE Preparation, avoid focusing on case law, which is a low-priority in the 1L Year. 1L Professors must use material focused on the basic 'Black Letter Law' tested on the FYLSX, and test 1L's on those basic skills and knowledge. I, along with other 1L's, repeatedly spoke to our instructors about the need for more FYLSX-focused instruction. Some responded and attempted to teach more to the FYLSX; others ignored us and taught according to their own preferences.

**Proposal:**

I contacted Anna Hawkins about the 1L teaching methodology inconsistencies; she stated that a 1L Curriculum for each subject would be essential for all 1L instructors, including sample exams, and hoped to develop this for PCL. I support and encourage this plan, and propose a 1L Curriculum to be developed immediately, without delay, utilizing Robert Skeels' Contracts Curriculum as a framework. The blueprint of this 1L Curriculum already exists, and the content from many of this year's 1L courses can be included to supplement. This is particularly crucial where 1L courses are taught by multiple volunteer instructors, such as Torts was this year, with four separate professors. A consistent curriculum would help smooth out the transitions from instructor to instructor, and not place the burden on the 1L's to literally 'train' their instructors in what the 1L's need to be taught, how to teach it, and when to teach it.

**5. Instructor Accountability and Professional Standards**

It is difficult to find attorneys who are willing to volunteer time and effort to teach without compensation, even when a school is well organized and able to function smoothly, with clarity, vision, free of rancor. As detailed *Supra* in item 2, there is an uneven standard of organization

and instruction amongst professors, and the level of teaching at PCL is highly inconsistent, to say the least.

As an example, James Simmons taught Torts in 2019-20; at that time there were similar issues of poor instruction, lack of organization, and a failure to turn in grades. Many complaints were submitted. Despite this, he was invited back to teach Criminal Law in 2020-21, during which time his poor performance compounded. During the Criminal Law course Mr. Simmons stated that he was open criticism and available for questions; when several 1L's came forward, they were dismissed and ignored. The 2Q Midterm contained a highly questionable, triggering Statutory Rape Essay, offending numerous students who complained to the PCL Administrator. Another 1L instructor who saw the Essay Question when completing Mr. Simmons' class grades wrote:  
*"...the Simmons midterm question was horrifying and I was literally aghast when I read it. The school must make a substantial effort to prevent that kind of conduct from ever occurring again. While that question would have been offensive and highly inappropriate in any era, it is even more so in 2021 when there is, ostensibly, more awareness of traumatizing students."*

Multiple future class sessions contained similar material on sexual crimes that was offensive and insensitive. Lectures consisted of selections of text taken straight from the Hornbook and presented as a slide show, which was then read aloud by Simmons or the students in turn.

Understandable errors and mistakes will occur, and developing COVID twice is a legitimate excuse for poor performance; then there are serious lapses in judgment that create unprofessional and unacceptable circumstances and standards that are very disrespectful to the students and PCL community. Despite these clear violations of professional, community and CA State Bar Standards for instruction, Mr. Simmons was bestowed with a school award at PCL's 46<sup>th</sup> Anniversary Fundraiser on April 29<sup>th</sup>.

In raising these issues with PCL Board and Community Members who guided the school through the 'takeover' years I have been told repeatedly, "Well, you should have seen it before the takeover! It was much worse then." or "I had horrible instructors, too." This, while also understandable, is unacceptable five years later. It brings to mind the attitude of those subjected to hazing or deep disregard and now are desensitized to the infliction of that same mistreatment upon others.

The CA State Bar's *Rules for Unaccredited Law Schools* state:

Division 4. Administrator, Dean, and Faculty

4.8 Evaluation of Instructors.

*A law school must adopt written procedures for the regular evaluation of instructor competence. In evaluating the competency of an instructor, the factors to be considered are:*

- (A) The instructor's education, knowledge, and experience in the subject matter;*
- (B) The instructor's competence in the classroom or in other instructional activities;*
- (C) The instructor's teaching skills given the technology and methodology used in instruction, and the quality of participatory experiences employed;*
- (D) The instructor's organization of the course as demonstrated by outlines or syllabi;*
- (E) The quality, nature, and type of examinations, and other assignments and the quality of grading;*
- (F) The relation between the field of instruction and the area of specialization, if any, of the instructor in private practice; and*
- (G) The years of experience, both in teaching and in practice.*

4.9 Basis of Instructor Evaluations.

*The evaluation of instructor competence is generally determined by observation in the classroom or other instructional activities, which may include, for distance-learning law schools, monitoring both synchronous and asynchronous activities. Evaluation also includes review of the materials used in the course, examinations given, and the extent to which examinations and grading standards provide a reasonably accurate appraisal of each student's ability. A comparison of course grades with examination scores in like subjects and the relation between the two are regarded as some indication of the quality of instruction, examinations, and grading standards.*

Division 5. Academic Program and Scholastic Standards

5.1 Academic Program.

*A law school must maintain a qualitatively and quantitatively sound program of legal education.*

5.2 Criteria for Determining Compliance with Guideline 5.1.

*In evaluating the qualitative and quantitative soundness of a law school's program of legal education, the*

Committee will consider:

- (A) The content and scope of the curriculum;
- (B) The competence of the instructors with respect to their knowledge of the subject matter and their ability as teachers;
- (C) The materials used in each course, including required and recommended texts, course outlines, and syllabi;
- (D) The effectiveness of the methods of instruction used;
- (E) Admission requirements, including minimum levels of prior education, preparation, or training;
- (F) The number of students in classes or instructional units;
- (G) The quality of examinations, assignments, and other student work as an indication of course coverage and as a measure of student knowledge and analytical ability;
- (H) The soundness of the grading system;
- (I) The availability of adequate legal research resources;
- (J) The adequacy of the law school's finances; and
- (K) The cumulative success of the law school's graduates on the California Bar Examination over such period of time as the Committee determines is appropriate.

PCL does not follow the above guidelines either in letter or spirit; by inviting back an instructor who was known to not meet these standards, the Board has violated these CA State Bar Guidelines.

The ability to attract, engage and retain reliable, committed professors is of key importance at PCL; it is second only to the priority of recruiting high quality, motivated students. A main reason instructors leave PCL or refuse to return is more than likely a lack of practical and administrative support, the contentious atmosphere and the highly dysfunctional state of the school, detailed *Supra* in item 2.

**Proposal:**

PCL must retain the excellent instructors it already possesses, cease the infighting and lack of cohesive functioning that feeds attrition of its faculty pool, and uphold basic standards of instruction as detailed by the CA State Bar. Instructors need clear guidelines and expectations, reinforced by a small stipend for grading as outlined *Supra* in item 3. The FCC could provide those guidelines and continue to assist the school in improving its Faculty Pool.

**6. Required Use of Populi/Teams by PCL Community**

Due to the COVID-19 pandemic, PCL obtained permission from the CA State bar to function as an online/distance learning school. MS Teams and Populi were hastily set up in mid-2020 by the PCL Administrator, and numerous trainings were scheduled for Board, Committee and Faculty members. Dedicated 2L and 3L students, along with the PCL Administrator, were mainly responsible for this set-up and training of faculty.

After a year of all online instructions, I have been told directly from Board and Committee Members, including the Dean, that they are unfamiliar with these programs and are unwilling to use them when asked. This year's 1L class conducted all their online learning through Populi and MS Teams, which some 1L instructors did not use or know how to use. When attempting to set up a schedule of Practice/Mock FYLSX at the end of the 2020-21 academic year, I was asked by Board and Committee Members to communicate with them outside of these online programs, as they did not use them. However, the 1L's have been required to use these programs for the entire year without any formal training or onboarding.

The CA State Bar's Rules for Unaccredited Law Schools state:

**Division 7. Physical Resources**

**7.2 Instructional Equipment; Resources and Procedures to Address Technology-Related Problems.**  
*A law school must have and maintain instructional equipment adequate to support its educational program. A law school must have and allocate adequate resources and create and maintain adequate procedures to promptly and effectively address technology-related problems in the delivery of its educational program.*

**Proposal:**

To ensure equitable access and transparency, ease of administration and communication, all active PCL Board and Committee Members must train and use the school's online learning and administrative programs (Populi and Microsoft Teams) at a basic level. Annual trainings for all PCL Community Members, including students, should be conducted to keep the members of the PCL Community fluent in these programs at a basic level and familiarized with updates to the programs. Board, Committee and Faculty Members should use these programs to communicate with students for all school business.

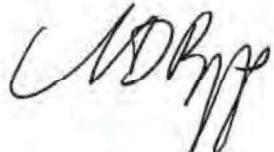
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I am requesting time to present these Grievances at the June PCL Board Meeting, now moved from June 20<sup>th</sup> and scheduled for June 19<sup>th</sup>. I also request a written response to this Formal Grievance be submitted no later than June 30<sup>th</sup> 2021.

My intention is to clarify what I feel stands in the way of the basic functioning of People's College of Law. I believe in the integrity of school's mission; it is heartbreaking how neglected the institution is at this juncture in time, indicated not only by the dysfunction exhibited in its management and operations, but in the dilapidated state of PCL's physical campus. Having spent many Accountability Hours there this spring with Anna Hawkins, I attempted to reconcile the sad state of the school's records, campus and community with the ideals proposed by PCL's professed identity as a 'Community Law School'.

So long as I am a part of the PCL community I will communicate openly and clearly, to delve to the root of these maladies keeping the school from achieving its historic goals.

Sincerely,



Nancy Popp, '24  
[npopp@peoplescollegeoflaw.edu](mailto:npopp@peoplescollegeoflaw.edu)



# The State Bar *of California*

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**OPEN SESSION  
AGENDA ITEM O-402  
JUNE 2021  
COMMITTEE OF BAR EXAMINERS**

**DATE:** June 18, 2021

**TO:** Members, Committee of Bar Examiners

**FROM:** Natalie Leonard, Principal Program Analyst

**SUBJECT:** Progress Report Related to Periodic Inspection Report – Peoples College of Law

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## EXECUTIVE SUMMARY

This agenda item presents Peoples College of Law's progress report, documenting its progress completing the recommendations adopted by the Committee of Bar Examiners after reviewing the law school's periodic inspection report. (Attachment A)

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## BACKGROUND

Peoples College of Law is a registered, unaccredited fixed facility law school founded in 1973 and located in Los Angeles, California. The law school has always focused on preparing students for practice in public interest law.

Registered, unaccredited law schools undergo inspection every five years to confirm continuing compliance with the Rules for Unaccredited Law Schools and their guidelines.

State Bar Educational Consultant Heather Georgakis conducted an inspection of Peoples College of Law on January 14-16, 2020 onsite at the law school.

The Committee accepted the report and continued the law school's registration contingent upon: 1) addressing the recommendations listed below; 2) providing annual progress each year by November 15 to document progress, completion, or sustained compliance as to each recommendation; and 3) agreeing to undergo a follow up inspection in fall 2022.

PCL provided a timely progress update submitted with its 2020 Annual Report, and recently amended the progress report in May 2020 to document additional progress.

## DISCUSSION

The Committee adopted required PCL to address the following 23 recommendations as a result of the observations during its periodic compliance inspection. The original recommendation is listed first, followed by a summary of law school's current status in italic font. The law school's full response is attached. (Attachment A)

Overall, the law school has maintained or enhanced compliance as to each of the recommendations as documented below.

## RECOMMENDED MANDATORY ACTIONS

1. **Guidelines 1.9 and 2.10:** To achieve full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy. *Subsequent to the inspection, the law school adopted a compliant policy, provided the State Bar with a copy of that policy, and implemented that policy.*
2. **Guideline 2.2(B):** To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications. *Subsequent to the inspection, the school published a single clear policy, provided a copy of that policy to the State Bar, and implemented that policy.*
3. **Guideline 2.3(B):** To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not taught each year, but are offered from time to time based on student interest and instructor availability. *Subsequent to the inspection, the school updated the course list, deleting two courses that were not being offered, and adding the language regarding the frequency with which the remaining courses are offered. The law school advises that this list is updated and compliance has been maintained.*
4. **Guideline 2.3(D):** To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated. *These disclosures have been corrected and completed and posted or provided timely since the inspection.*

5. **Guidelines 2.9(A)-(B) and 5.24:** To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated. *Subsequent to the inspection, the school provided its updated Catalog, which remains current.*
6. **Guideline 2.9(C):** To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. *Subsequent to the inspection, the school adopted a compliant policy, provided the State Bar with a copy of that policy, and implemented the policy by loading syllabi into the school's learning management system where students can access them.*
7. **Guideline 2.9(D):** To bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software. *Subsequent to the inspection, the school advised that it adopted a secure testing policy that requires exams to be proctored in person or proctored remotely through Microsoft Teams.*
8. **Guidelines 2.10 and 5.17:** To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements. *Subsequent to the inspection, the school adopted a compliant policy, and provided the State Bar with a copy of that policy. The policy will be implemented at the end of the fall quarter in November 2021 and the law school's information system has been updated to hold grades until the administrative review is complete.*
9. **Guidelines 2.11, 7.1, and 9.1:** To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. *Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools and containing the recommended safeguards. The school will complete phase one of its data loading plan by August 2021.*
10. **Guideline 3.1:** To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. *Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni. The school has created job descriptions for its key administrators, and increased the paid hours allotted to its registrar.*
11. **Guidelines 4.8 and 4.9:** To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. *Subsequent to the inspection, the school adopted a compliant policy and provided a copy of the policy to the State Bar. The policy has been implemented and over thirty faculty evaluations have been completed during this school year.*

- 12. Guidelines 5.3(A)(1) and 5.9:** To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. *Subsequent to the inspection, the school adopted a compliant policy, provided a copy to the State Bar, and implemented the policy. Attendance is tracked by instructors or the registrar and recorded in Populi.*
- 13. Guideline 5.8:** To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy. The law school now requires students to fill out and submit timesheets as a mandatory requirement for all clinical courses, and the registrar reviews the timesheets to confirm the required hours.*
- 14. Guidelines 5.17, 5.18, and 5.25:** To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance. *Subsequent to the inspection, the law school formulated a responsive policy that will be presented shortly to the law school's Board for adoption and implementation in summer 2021. The law school has also implemented a policy requiring professors to provide constructive feedback as to exam performance and grading.*
- 15. Guidelines 5.18–5.20:** To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines. *All identified policies were reviewed and updated in a compliant manner, and compliance has been maintained.*
- 16. Guideline 5.24:** To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. *Subsequent to the inspection, the school adopted a compliant policy, provided a copy of the policy to the State Bar, and implemented that policy.*
- 17. Guidelines 6.2–6.4:** To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement.

*Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi were updated appropriately. In the progress report, the law school advises that it has renovated the library space that had previously been destroyed by fire, and the law school intends to purchase the required library books upon the students' return to in-person classes.*

- 18. Guidelines 7.1 and 7.2:** To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. *Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other technology options, which remain in working order.*
- 19. Guideline 9.1:** To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D). *Subsequent to the inspection, the school adopted compliant policies, provided copies to the State Bar, and implemented those policies.*

#### SUGGESTIONS FOR MAINTAINING CONTINUED COMPLIANCE ADOPTED BY THE COMMITTEE

1. Pursuant to Guidelines 2.9(C) and 5.13, it is suggested that the school require faculty to use a standard syllabus template to promote consistent communication of course requirements. *Subsequent to the inspection, the school purchased a commercially available software package that includes a standard syllabus template used in all courses.*
2. Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school base its data security policies and procedures on generally accepted industry standards, consulting with an expert if the expertise is not available within the school. *Subsequent to the inspection, the school purchased commercially available software package with these features. All data is now stored in the system on a forward basis and a significant amount of history is also being loaded. The law school also purchased the appropriate storage containers for files held only in hard copy, such as data more than ten years old.*
3. Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopt and implement a procedure requiring that exam questions, accompanied by issue outlines or model answers, be reviewed, and approved by the dean or another legal educator before being administered. *Subsequent to the inspection, the law school created a proposed policy, provided a copy of that policy to the State Bar and scheduled the policy for consideration by the school's board this summer.*
4. Pursuant to Guidelines 5.17, 5.18, and 5.25, it is suggested that the school adopt and implement a procedure requiring grades and student exams papers to be reviewed and approved by the dean or another legal educator before being posted. *Subsequent to the inspection, the law school implemented a pilot policy, adjusted the policy based on the*

*results of the pilot, provided a copy of the amended policy to the State Bar, and scheduled the amended policy for further discussion by the school's board this summer.*

The law school not only maintained its prior progress, but also made significant additional progress, implementing many policies. Notably, the school has also repaired its library space previously damaged by fire. In addition, the law school has made an effort to maintain consistent staffing presence.

The law school will be providing further progress reports in its 2021 and 2022 Annual Reports and will be re-inspected in fall 2022.

## **FISCAL/PERSONNEL IMPACT**

None

## **AMENDMENTS TO RULES OF THE STATE BAR**

None

## **AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL**

None

## **STRATEGIC PLAN GOALS & OBJECTIVES**

Goal: None - core business operations

## **RECOMMENDATIONS**

It is recommended that the Peoples College of Law Updated November 2020 Progress Report on Compliance with Recommendations in State Bar Inspection Report of 2020, as amended on May 28, 2021, be received and filed.

## **PROPOSED MOTION**

Should the Committee of Bar Examiners agree with staff recommendations, the following motion should be made:

**MOVE**, that the Peoples College of Law Updated November 2020 Progress Report on Compliance with Recommendations in State Bar Inspection Report of 2020, as amended on May 28, 2021 and set forth in Attachment A, be received and filed.

## ATTACHMENT(S) LIST

- A. Peoples College of Law Updated November 2020 Progress Report on Compliance with Recommendations in State Bar Inspection Report of 2020

**PEOPLES COLLEGE OF LAW  
NOVEMBER 2020 PROGRESS REPORT  
ON COMPLIANCE WITH RECOMMENDATIONS  
IN STATE BAR INSPECTION REPORT OF 2020**

**RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT**

**1. Guidelines 1.9 and 2.10:**

**Bar's Inspection Report**

“To achieve full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school’s privacy policy. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*”

**PCL'S Progress Report**

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. One provision of the policy is: “Once each calendar month, the Administrator shall distribute a reminder of this Student Privacy Policy, with its full contents, to the Registrar, the Dean, and all officers, members of committees, members of the Community Board, employees and Faculty Members, by automatically scheduled email or otherwise.” Starting at the beginning of this academic year, we have complied by distributing the policy by email every month to the required recipients. The Dean has calendared for himself a reminder to distribute it at the beginning of every month. Soon our new Student Information System, Populi, will distribute it automatically on the first of every month.

**2. Guideline 2.2(B)**

**Bar's Inspection Report**

“To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications. *Subsequent to the inspection, the school published a single clear policy, and provided a copy of that policy to the State Bar.*”

**PCL'S Progress Report**

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. This new policy appears in our Tuition and Enrollment Agreement and our Student Handbook & Catalog. In late August and early September 2020 the students signed their Tuition and Enrollment Agreements, with the refund policy prominently displayed. The Student Handbook & Catalog, with the new refund policy, is posted on our website.

### **3. Guideline 2.3(B)**

#### **Bar's Inspection Report**

“To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not taught each year, but are offered from time to time based on student interest and instructor availability. *Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency.*”

#### **PCL'S Progress Report**

As noted in the Inspection Report, some months ago PCL came into compliance by deleting from the Student Handbook & Catalog the courses required to be deleted. Also, this past summer (2020) we had two elective courses, clinical courses on Criminal Defense and Eviction Defense. It was the second year in which the clinical course on Criminal Defense was given, the first year for Eviction Defense. We want to repeat them next summer, but since the courses are so new, we have refrained from listing them in the catalog yet.

### **4. Guideline 2.3(D)**

#### **Bar's Inspection Report**

“To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated. *These disclosures have been corrected and implemented.*”

#### **PCL'S Progress Report**

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the fall quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, the Dean signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

### **5. Guidelines 2.9(A)-(B) and 5.24**

#### **Bar's Inspection Report**

“To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated. *Subsequent to the inspection, the school provided evidence of the updates as required.*”

## PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising these policies as required. One of the changes in our policies has to do with student privacy. Specifically, our Student Handbook & Catalog now prohibits students from participating in proceedings involving possible academic disqualification of other students without consent of the student in jeopardy of disqualification. Likewise it prohibits students from participating in academic grievance proceedings without the consent of the student who made the grievance. These new provisions are being implemented right now. We are in the midst of proceedings in which a student is challenging a failing grade, and these new provisions have been put into practice. Specifically, the student was informed at the outset that without the student's consent, other students would not participate in the proceedings. The student in question chose to have the other students participate. The other students are members of our Faculty-Curriculum Committee. One of the functions of that committee is to pass on petitions for grade changes.

## 6. Guideline 2.9(C)

### Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

### PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising the policies as required. The Dean has reviewed the syllabi that have been entered into Populi, and finds that all but three professors have included in syllabi written statements of the components of course grades, but two of those are pass-fail courses. For the coming winter quarter, the Dean will send a reminder to all faculty to comply with this requirement.

## 7. Guideline 2.9(D)

### Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software. *Subsequent to the inspection, the school advised that it is actively evaluating options to implement secure testing.*"

### PCL'S Progress Report

During this fall quarter, PCL adopted the following policy and procedures on authentication of student work:

## POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

**A. Exams:** All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their other electronic devices turned off. If the exam is given remotely, all students must have their video activated during the entire exam, but exceptions are allowed for student who encounter technical problems that result in the student not being able to have their video activated.

(The Faculty-Curriculum Committee notes that exams are given with Microsoft Teams. Teams requires students to register for each exam. The students' exam answers are sent to the Microsoft Teams account and only accessible through Teams. When taking the exams, the students' computer screens are locked upon being opened by the student, and thus the students cannot access other materials while the test is being taken. While taking the exam, the student is observed by the exam proctor through the webcam. The students' exam answers are submitted to the proctor through the students' Microsoft Teams account.)

**B. Remote Class Participation:** In all classes given remotely every student should have their video activated during the entire class, unless the student has hardware or software issues related to their computer or internet service provider or an extraordinary circumstance.

(The Faculty-Curriculum Committee notes that online classes are given with Microsoft Teams. The students attend class through teams. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

### 8. Guidelines 2.10 and 5.17

#### Bar's Inspection Report

"To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

#### PCL'S Progress Report

We have begun implementing our new administrative grade review policy. Our committee in charge of it, the Faculty-Curriculum Committee, has met to formulate plans for the first implementation, which will be for the fall quarter grades later in November. Our Registrar/Administrator has adjusted our Student Information System to hold the grades for administrative review before the grades are issued to students and entered in their transcripts.

## **9. Guidelines 2.11, 7.1, and 9.1**

### **Bar's Inspection Report**

"To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. **Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in this report.**"

### **PCL'S Progress Report**

Our Registrar/Administrator has largely completed the very substantial job of entering the digital records into Populi.

## **10. Guideline 3.1**

### **Bar's Inspection Report**

"To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. **Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni. The school will monitor the adequacy of its administrative capacity. The school also created compliant job descriptions for both the dean and the registrar.**"

### **PCL'S Progress Report**

Our Registrar/Administrator continues working full-time. During this fall quarter, others have greatly contributed to the school's administrative work. Following are some examples. One of our upper division students trained faculty and students in the use of Microsoft Teams, our new system for online classes and exams, has inquired with faculty and students about problems experienced with Teams, and has assisted them with problems. Our Faculty-Curriculum Committee, whose members are students, faculty, alumni and the Dean, organized and conducted our student orientation and our fall faculty meeting. An ad hoc committee is organizing our upcoming Strategy Planning Meeting and Membership meeting. (PCL is a nonprofit corporation. That type of corporation has members rather than shareholders, and PCL's members are students, faculty, alumni and former board members and officers.) Our Development and Fundraising Committee, whose members are alumni and the Dean, has weekly meetings with our professional fundraiser, and along with her has submitted several grant applications this fall, and has begun planning an online fundraising event. We have been awarded one grant so far. Our Building Committee has helped with obtaining bids for repair of the library roof.

## **11. Guidelines 4.8 and 4.9**

### **Bar's Inspection Report**

"To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. **Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.**"

### PCL'S Progress Report

We have begun the process of instructor evaluation. Instructors are evaluated by their own students and by members of the Faculty-Curriculum Committee. We use a standard evaluation form. It has been sent to the students. Members of the Faculty-Curriculum Committee already have the form, and have begun sitting in on classes online as part of the evaluations.

## 12. Guidelines 5.3(A)(1) and 5.9

### Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

### PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. This fall our Registrar/Administrator has been viewing the classes in order to take attendance and record it in Populi. At times the instructors have taken attendance and reported it to the Registrar/Administrator.

## 13. Guideline 5.8

### Bar's Inspection Report

"To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

### PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. Thereafter we had two clinical courses this summer. The Dean created an Excel spreadsheet form to be used by students as timesheets to record the time and activities of their course work. As an attachment to the email below, the Dean sent the timesheet form to all students and instructors in the clinical courses. The Dean sent reminder emails to the students a number of times during the summer quarter. At the end of the quarter, the Dean reviewed the timesheets submitted by the students, evaluated them, and reported to the Registrar/Administrator which students were entitled to credit for these clinical courses, and which were not.

**From:** Ira Spiro  
**Sent:** Monday, June 29, 2020 6:49 PM  
**[names of recipients omitted from this report]**

**Subject:** TIMESHEETS for CLINICAL CLASSES - MUST BE FILLED OUT BY STUDENTS TO GET CREDIT  
**Importance:** High

Dear PCL SUMMER Students

Because of State Bar requirements, **you have to fill out timesheets in order to get credit for our clinical courses.** A form timesheet is attached, an Excel spreadsheet. It's very easy to use. I filled them out every day, all through the day, when I was practicing law. Here's what to do:

1. Download the attachment to your computer.
2. Type your name and the course name at the top.
3. If you're taking both clinical courses, you'll have to have two separate timesheets, so save it twice, each with a different name for use by your computer.
4. **Fill them out every day when you're done with work for the day.** Way too hard to wait, say, a week, and try to remember your time at the end of the week. This is very good practice for when you become a lawyer, because most all lawyers have to fill out timesheets
5. "Date" column: When you start typing the date, e.g. 6/29, the year gets filled in automatically.
6. "Hours" column: You can round to the nearest quarter hour, for example .45, 1.75, 2.25. (But when you practice law, you should round to nearest tenth.)
7. "Task" column: What you fill in can be very short. For example, "attend Zoom" or "draft letter" or "draft memorandum" or "phone call to prof". You can use abbreviations if you're sure you'll remember what they stand for. For example TC for telephone call, dft for draft, memo is fine for memorandum.
8. **Email them to me every Friday when you're done with your work that day.** State Bar requires someone on faculty to monitor the students, and it's going to be me.
9. If you have any questions about this, give me a call (310-235-2350), or send me an email. Remember, my phone doesn't receive texts.

#### 14. Guidelines 5.17, 5.18, and 5.25

##### Bar's Inspection Report

"To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance. *Subsequent to the inspection, the school began addressing this issue and it continues to discuss further options with priority.*"

## PCL'S Progress Report

The Inspection Report does not reflect a number of very important improvements PCL made between the time the report was first published by State Bar staff and the time it was adopted by the Committee of Bar Examiners. Therefore, we discuss those changes below, although we did report them during the summer.

### Policies to Eliminate Grade Inflation

The Inspection Report, on page 15, referring to the 2014 inspection, states:

"To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is "clearly inappropriate" in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL's policy allows up to thirty percent of a course grade to be based on participation."

This summer we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

#### **Grading Standards:**

It is of primary importance for PCL students and all of PCL that the students have a realistic picture of a realistic picture of their outlook for passing First Year Law Students Exam (FYLSX) and Bar Exam. The pass rates for both exams have been very low. For example, the pass rate for the July 2019 Bar Exam was 14.4% for California Unaccredited law schools and 18.8% for California-Accredited (non-ABA) law schools.

On the FYLSX of June 2019, the pass rate was 23.5% for all takers and 28.1% for California Unaccredited Fixed-Facility law schools (PCL is in that category). Students' ideas about their chances on these exams are very likely influenced by their law school grades. If a student receives high grades, that is likely to raise the student's expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on the exams, the heightened expectations could well be unrealistic. In light of these and similar considerations, PCL has adopted these Grading Standards for all examinations and final grades (grades for the full quarter) in all courses that are not graded pass-fail. NOTE that in the grouping of grades in the table below, C- grades are grouped with the D grades. That is because at PCL, in order for a student to advance to the next academic year and graduate, the student must have a grade point average of C or better.

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89	Grades in this range should be only for excellent work, not merely good work. On

(B+, B and B-)	an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 – 72 (C- to D+)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

\*\*\*

**... class participation must not count for more than three percent (3%) of the final grade in a course, and attendance may not be counted at all towards the grade, inasmuch as minimum 80% attendance is required.**

### **Administrative Review of Grades**

In August, 2020, our Board adopted the following Administrative Review policy:

When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty- Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviewed.

The reviewers would study the grades for adherence to PCL grading policies. ... If the grade reviewers find deficiencies, they would communicate with the faculty member about curing the deficiencies and changing the grades. The Dean or the Faculty- Curriculum Committee or both would participate in those discussions and decisions on changing grades. When the decisions are made, the grades would then be sent to the Administrator for release to students.

### **Improvements in Eliminating Faculty Turnover**

The 2014 Inspection Report observed (p. 9):

"PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty's dedication to PCL's mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty

members are paid even a modest stipend or salary. ... on average, 20% of PCL's faculty appears to be new each academic year."

That turnover situation has been reversed. In the present academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover had been on the decline previously as well.

## 15. Guidelines 5.18–5.20

### Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines. *All identified policies were updated, and non-compliant policies deleted.*"

### PCL'S Progress Report

The problem was some inappropriate policies. PCL has eliminated them, so by the very nature of this item 15, no further progress is needed or possible.

## 16. Guideline 5.24

### Bar's Inspection Report

"To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

### PCL'S Progress Report

As the Inspection Report notes, some months ago we adopted the required policy. The policy concerns limitations on repeating courses. As stated above, this fall a student has petitioned for permission to attempt to raise a failing grade. In order to raise the grade, the student will have to take a new exam or complete some other assignment to be determined by the instructor and the Faculty-Curriculum Committee working together. It is possible that the student may choose instead to convert the petition to one for repetition of the course pursuant to the new policy.

## 17. Guideline 6.2–6.4

### Bar's Inspection Report

"To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. *Subsequent to the inspection, the school did confirm that legal research*

*is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.”*

### **PCL'S Progress Report**

PCL has devised the requested plan regarding the library. It is set out in the Annual Report. It reads as follows:

PLAN TO RETURN TO COMPLIANCE: The brother of PCL founder, attorney Hank di Suvero, who died this year, has offered to donate funds for the library. Our plan is to use the money to restore the library to usable condition and purchase the books needed to bring the required hardbound books up to date, all to be completed by August 31, 2021.

Our Board of Directors approved this plan on October 18, 2020.

We do still believe that the hardbound library requirement, which does not apply to other categories of California law schools, should not be applied to our category, as we have explained previously.

## **18. Guidelines 7.1 and 7.2**

### **Bar's Inspection Report**

“To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options.”

### **PCL'S Progress Report**

PCL purchased four matching, locking, letter-size Fireking fireproof file cabinets. We took delivery of them at out building and locked our paper files in them.

## **19. Guideline 9.1**

### **Bar's Inspection Report**

“To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D). *Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies.*”

### **PCL'S Progress Report**

Our Registrar/Administrator reported as follows to the Bar and the Committee:

#### **New Student Information System**

To streamline and organize student records, faculty records, and other required organizational documentation, Peoples College of Law is transitioning to Populi, a web-

based Student Information System (SIS) to electronically maintain and store school records in a secure and confidential environment.]

Our SIS is manages and stores student transcripts, student attendance (for online and in-class instruction) & participation records, academic programs & courses, course mapping for students and course rosters as well as provides reporting analytics to give perspectives on student data through particular data sets. The SIS also tracks a prospective student's application process and generates applicant reports for accepted and rejected applications. Once a student is enrolled, student agreements, billing (including invoices, payments, transactions, deposits, and tax forms) are also stored electronically. Faculty, Admin, and Registrar will have detailed information on students' grades and attendance in courses, with student course summaries and reports.

Our SIS system also has group sections that will accommodate our committees and store committee documents including minutes & agendas. Hardcopies of board minutes and Faculty minutes will also be kept in the administrator's office.

In addition to the SIS, the administrator will also maintain hardcopy files for students, administrative personnel, and faculty in fireproof, securely locked file cabinets.

We are currently transitioning to our new SIS. Our phase one phase has begun. We are integrating our historical and past data into our SIS and we will be entering student records for the past ten years, faculty information & records for the past five years, personnel records for the past ten years, and course information. We anticipate phase one will be completed by August. Phase 2 will involve entering historical student records and personnel records dating back to 2005. Historical permanent records dating back before 2005 will be electronically scanned and stored securely in the cloud as a back-up to the existing hardcopy files that are kept in fireproof, securely locked file cabinets.

### **PCL Files and Records**

In preparation for the State Bar of California inspection, the administrator completed a thorough assessment of the school's files and records that fall under Rule 9.1 in the Guidelines for Unaccredited Law School Rules. Much of the reason that the school's records and files were out of compliance at that time was because there has not been a systematic uniform process set for each administrator who has worked at the school over the past several years.

For files and records that the administrator found to be out of compliance, best efforts were made to reconcile them prior to the inspection in January.

Files and records that were not compliant post inspection, the administrator continued to reconcile the deficiencies to complete the records.

Currently, the remaining noncompliant files under the Unaccredited Law School Rules Division 9.1 requirements are: faculty files, administrative personnel, and the file of all examinations given in the last (5) years.

**Faculty Files:** Approximately 1/3 of the faculty files for the past (5) years are missing law school transcripts. Administrator is actively contacting current and past instructors and requesting the missing law school transcripts. To prevent noncompliance within the

faculty records, our Faculty & Curriculum Committee are developing policy to request transcripts prior to hiring interviews or requiring them during new faculty onboarding.

**Administrative Personnel Files:** Several administrative personnel files are missing all or part of the required personal histories giving undergraduate education, graduate education, and law school education (if any) listing years attended, degrees conferred and summaries of professional careers and qualifications for being administrative personnel. The administrator is currently going through archived materials for older administrative personnel files. The administrator has requested information from current administrative personnel who have files missing the required information and will continue to follow up with those persons who are still missing some of their personal history.

**File of Examinations:** As required under 9.1(F), all examinations given in the last five years are to be kept in a file for inspection by the Committee. The administrator has been making best efforts to compile administered midterm and final exams for the past five years. For exams given in the 2019-2020 academic year, administrator has created a hard copy file and has actively been adding exams as they are administered. Our student information system (which we will implement for faculty this upcoming 2020 Fall Quarter) facilitates the creation of tests by instructor that are saved electronically per course as well as permits uploading of exams created outside of the SIS. Further, administrator is developing protocols to collect the hard copies of the exams as part of the administrator's checklist re: maintenance of required records.

#### **Record Retention and Disposal Policy:**

The school is also developing a policy for record retention and disposal and a retention schedule to ensure we keep records according to the State Bar Rules and Guidelines.

#### **New Policy on Changes to Entries in Transcripts**

PCL has adopted the following new policy on changes to entries in transcripts:

Changes to entries on a PCL transcript may be made only upon a showing of good cause. However, a contention or possibility that a grade given by an instructor was not justified shall not be good cause or an acceptable reason for a transcript change. If a present or former student wishes a change to an entry on the person's transcript, the following procedures apply

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside

PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.

3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

4. The applicant may appeal the decision of the Dean to the Community Board, but may do so only by transmitting to the Chair of the Board a request for appeal within fourteen days of receiving the Dean's decision. In the request, the applicant must state whether the applicant consents to participation in the appeal by student members of the Community Board. The Community Board may delegate the appeal to the Executive Committee. Within thirty days after the Chair receives the request for appeal, the Community Board or the Executive Committee, as the case may be, shall render a written decision on the appeal, and transmit it to the applicant. The Chair shall cause the request for appeal and any materials read or considered in connection with the appeal to be placed in the applicant's student file. If the decision on appeal is that a change is to be made, the decision must specify the change, and the Chair shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

5. No student member of the Community Board or the Executive Committee shall participate in the appeal unless the applicant consents in writing to participation by students.

## **RECOMMENDED SUGGESTIONS IN 2020 INSPECTION REPORT**

### **1. Bar's Inspection Report**

"Pursuant to Guideline 2.9(C) and 5.13, it is suggested that the school require faculty to use a standard syllabus template to promote consistent communication of course requirements."

### **PCL'S Progress Report**

As we have said, PCL's new Student Information System has electronic features that enable the school to create global rubrics for use in any or all the courses. Those features can also be used to create a standard syllabus template.

## **2. Bar's Inspection Report**

“Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school base its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school.”

### **PCL'S Progress Report**

As we report above, our data security is provided by the security protections of our new Student Information System, Populi. Populi’s website states the following, among other things, concerning its security protections:

“Populi’s servers are stored in an SSAE 16 Type II compliant data center that is physically secured behind a battery of compartmentalized security zones with biometric access controls. Numerous security, power supply, and infrastructure redundancies layer on additional safeguards.

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“We built Populi on the open-source “LAMP” stack (Linux, Apache, MySQL, PHP), availing you of the same powerful, secure technology undergirding web companies like Google, Vimeo, Facebook, and Amazon.”

## **3. Bar's Inspection Report**

“Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopt and implement a procedure requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered.”

### **PCL'S Progress Report**

We have not instituted this procedure. It would require a great deal of additional work for the Dean, and we do not have other legal educators available for it. The Dean has a good deal of other work to do for the school. Our entire faculty, and the Dean, are unpaid volunteers.

## **4. Bar's Inspection Report**

“Pursuant to Guidelines 5.17, 5.18, and 5.25, it suggested that the school adopt and implement a procedure requiring that grades and student examinations papers must be reviewed and approved by the Dean or other legal educator before being posted.

### **PCL'S Progress Report**

As we state above, we have adopted a procedure for administrative review of grades to take place before they become final and are posted. We have not adopted a procedure for review of examination papers. If we understand this idea correctly, it would be very difficult for us to do that for the same reasons that apply to item 3 above.

EXHIBIT 3

Exhibit 3 , pg. 1 of 33

# Profiling the Outcomes on the FYLSX

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AN STUDY OF EXAMINEE  
PERFORMANCE AND OPPORTUNITIES  
FOR PROGRAM IMPROVEMENTS

# Initial Passage Rates for 1st Time Test Takers by Year 2000-2016

Category	2000-2003	2004-2007	2008-2011	2012-2016	All Years
Overall	30%	28%	26%	25%	27%
Race					
Asian	27%	27%	27%	20%	26%
Hispanic	21%	17%	19%	18%	18%
Black	11%	9%	11%	8%	9%
White	39%	36%	35%	34%	36%
Other	21%	20%	17%	23%	20%
Missing	18%	22%	10%	13%	16%
Gender					
Male	33%	30%	30%	27%	30%
Female	28%	27%	24%	23%	25%
Missing	15%	9%	3%	11%	9%
School					
ABA	16%	27%	25%	13%	21%
Accredited	21%	12%	10%	10%	14%
Unaccredited	33%	30%	28%	26%	29%
Correspond.	38%	31%	33%	29%	32%
Distance	36%	33%	27%	27%	31%
Fixed	20%	17%	20%	20%	22%
Other	19%	20%	21%	25%	22%
Medium:					
Regular	32%	29%	27%	26%	28%
Disqualified	11%	17%	16%	12%	14%
Special	56%	43%	50%	28%	45%

EXHIBIT 4



Todd Hill <toddryangregoryhill@gmail.com>

## FCC Agenda Item addition: Review of PCL Student Handbook Amendment 1.1.14 & 1.1.13

2 messages

**Kevin Clinton** <kevinclintonpro@gmail.com>

Wed, Nov 24, 2021 at 7:42 AM

To: Jessica Viramontes <chuyita.viramontes@gmail.com>

Cc: Naomi Cruz <ncruz@cruzvillatorolaw.com>, P Torres <pascualtO@yahoo.com>, Laura Urias <lauraeurias@gmail.com>, Nathalie Meza Contreras <ncontreras7@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, Hector Pena <hectorpena@ucla.edu>, Robert D Skeels <rdskeels@peoplescollegeoflaw.edu>, Juan Flores <jtradetech@gmail.com>, Scott Bell <scottbell772@gmail.com>

Dear FCC,

Please add to the Agenda: Review of PCL Student Handbook Amendment 1.1.14 & 1.1.13

**1.1.14- Prohibition against presenting oneself as a PCL agent to the public without PCL authorization:** No student, member of the Community Board, PCL

officer, or faculty member shall present themselves to the public as an official spokesperson or official agent, in any capacity, of PCL without official

authorization from the Community Board or any PCL officer delegated with this authority by the PCL Community Board. A disciplinary board, created by the PCL community board or Dean, shall make that determination whether a person has presented themselves as an official PCL agent without PCL authorization.

Examples of falsely presenting oneself as a PCL agent include, but or not limited to:

By either explicitly or implicitly attempting to make others believe one speaks about a specific issue on behalf of PCL, a person:

- (a) Corresponds with the California State Bar about PCL official business;
- (b) makes public statements about PCL official business;

A student, instructor, member of the administration or Community Member who violates this policy faces possible removal, suspension or expulsion from the law school and as determined by the appropriate PCL disciplinary body.

**1.1.13 - Prohibition against bullying or harassment:** No student, member of the Community Board, PCL officer, or current faculty member shall engage in any

pattern of conduct or activity considered to be bullying or harassment against any other student, member of the Community Board, PCL officer, or faculty

member. A disciplinary board, created by the PCL community board or Dean, shall make the determination whether a pattern of conduct rises to the level of bullying or harassment. Patterns of conduct that may rise to the level of bullying or harassment include, but or not limited to:

- (a) Ridiculing or insulting student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s);
- (b) Making false accusations against another student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s); and/or making false accusations against another student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s) for purpose of influencing PCL's official policy on any matter or on any decision in any regard;
- (c) Making threats against another student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s); and/or making threats against another student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s) for purpose of influencing PCL's official policy on any matter or on any decision in any regard;
- (d) Engaging in behavior that is discourteous, unprofessional, disrespectful, defamatory, against another student(s), member(s) of the Community Board, PCL officer(s), or faculty member(s); or engaging any other egregious behavior designed to coerce or influence member(s) of the Community Board, PCL officer(s), faculty member(s) or any other PCL volunteer.

The disciplinary board shall have broad discretion in making this determination; even one egregious incident, as determined by the disciplinary board, may rise

to the level of a pattern of conduct or activity considered to be bullying or harassment.

PCL's existence and day to day operation depends on PCL volunteers, thus ensuring PCL volunteers will be treated with

respect, regardless of their race, gender, sex, and national origin is of vital importance to the continued existence of PCL, and it conforms to the values of PCL.

**Any allegations of misconduct by any volunteer must be pursued through proper PCL channels and will be evaluated and finalized within proper PCL channels.**

Any effort by any student to make defamatory statements against any member of the PCL community, outside of the proper PCL channels or to the public, will not be tolerated. Ensuring a safe environment for PCL volunteers is of vital importance to the continued existence and operation of PCL and the PCL community. A student, instructor, member of the administration or Community Member who violates this policy faces possible removal from the classroom, suspension or expulsion from the law school, as determined by the appropriate PCL disciplinary body. These rules shall be strictly enforced.

On Tue, Nov 2, 2021 at 9:12 PM Jessica Viramontes <chuyita.viramontes@gmail.com> wrote:

Hall,

A reminder that the FCC meeting is taking place this Friday, Nov 5 from 5:15-6:45 pm. The zoom link is below.

Please let us know if you can attend.

Topic: FCC  
Time: Nov 5, 2021 05:15 PM Pacific Time (US and Canada)

Join Zoom Meeting  
<https://us02web.zoom.us/j/89600060244>

Meeting ID: 896 0006 0244  
One tap mobile  
+16699006833,,89600060244# US (San Jose)  
+12532158782,,89600060244# US (Tacoma)

Thanks,

Jessica Viramontes, Esq.  
pronouns: She/Her/Hers

## **2 attachments**

'r!l2021-11-23 PCL anti-bullying Anti-agent policy.pdf  
366K

**11** 2021-11-23 PUBLISHED PCL Student Handbook Amendments.pdf  
91K

**Kevin Clinton** <kevinclintonpro@gmail.com>  
To: Jessica Viramontes <chuyita.viramontes@gmail.com>  
Cc: Naomi Cruz <ncruz@cruzvillatorolaw.com>, P Torres <ptorres@cruzvillatorolaw.com>, Nathalie Meza Contreras <ncontreras7@gmail.com>, Todd H. Pena <hectorpena@ucla.edu>, Robert D Skeels <rdskeels@pediatrics.ucla.edu>, Scott Bell <scottbell772@gmail.com>

Fri, Feb 4, 2022 at 5:42 PM

Bump for addition to todays Meeting.

[Quoted text hidden]

EXHIBIT 5



Todd Hill &lt;toddryangregoryhill@gmail.com&gt;

## crediting pay against tuition

10 messages

**Ira Spiro** <ira@spirolawcorp.com>

Thu, Jan 9, 2020 at 8:42 AM

To: "Todd Hill (toddryangregoryhill@gmail.com)" &lt;toddryangregoryhill@gmail.com&gt;

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" &lt;davidtylerbouffard@hotmail.com&gt;, "Gloria Perez-Stewart (gloriaperez@gmail.com)" &lt;gloriaperez@gmail.com&gt;, "Hector PENA (hectorpena@ucla.edu)" &lt;hectorpena@ucla.edu&gt;, Magda Madrigal &lt;magdamadrigal@earthlink.net&gt;

Todd, I don't think I wrote you to confirm that the Executive Committee approved you working up to 40 hours at \$15 per hour from Jan 4 to Jan 13, maximum \$600 gross pay. That's the limit on work and pay the committee authorized. Under the law, the pay will have to be as an employee, not an independent contractor, so withholdings will have to be deducted.

When you and I talked about this by phone, you said you want this pay credited against what you owe in tuition, that you did not want to be paid the money. Todd, in order for that to happen, the law requires that you approve it in writing. In another conversation you let me know, with regard to your proposal to pay \$250 and then \$1550, that you have paid the \$250 but not the \$1550. (Todd, Hector told me he talked to you last week about that proposal not having been accepted by PCL for the full year, only for the first quarter, and Hector said you would be sending a proposal for payment of the full year's tuition in full by August 31, but I don't know if you've done that yet.)

**So would you write back, saying "I approve" crediting the pay, up to \$600 towards what you owe in tuition, which exceeds \$600, rather than PCL paying you the money.**

Ira

*Ira Spiro, Attorney at Law**Dean, Peoples College of Law**310-235-2350**10573 West Pico Blvd. #865**Los Angeles, Cal. 90064**ira@spirolawcorp.com**website: spirolawcorp.com*

**THIS EMAIL MAY BE CONFIDENTIAL AND COVERED BY THE ATTORNEY-CLIENT PRIVILEGE. IF YOU HAVE RECEIVED IT IN ERROR, PLEASE PERMANENTLY DELETE IT IMMEDIATELY**

Will the executive committee please, please agree to this. to pay Todd Hill for 40 hours of work at \$15 per hour from tomorrow, Jan 4 to Jan 13, the day before the inspection. The total pay is \$600. The work would be helping Anna with whatever she requests, in her work preparing for the inspection.

Yesterday we got a request from the State Bar examiner for additional work. Anna had a huge amount to do already. Anna really needs this help.

*Ira*

**THIS EMAIL MAY BE CONFIDENTIAL AND COVERED BY THE ATTORNEY-CLIENT PRIVILEGE. IF YOU HAVE RECEIVED IT IN ERROR, PLEASE PERMANENTLY DELETE IT IMMEDIATELY**

Ira Spiro <ira@spirolawcorp.com>

Thu, Jan 9, 2020 at 9:37 AM

To: "Todd Hill (toddryangregoryhill@gmail.com)" <toddryangregoryhill@gmail.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <davidtylerbouffard@hotmail.com>, "Gloria Perez-Stewart (gloriaperez@gmail.com)" <gloriaperez@gmail.com>, "Hector PENA (hectorpena@ucla.edu)" <hectorpena@ucla.edu>, Magda Madrigal <magdamadrigal@earthlink.net>

Todd, pardon me, I made a mistake in my email below. Hector told me last week that your \$250/\$1550 proposal had been **considered** by PCL for the fall quarter (rather than the full year), not that it had been **accepted** for the fall quarter (it has never been accepted).

*Ira*

**THIS EMAIL MAY BE CONFIDENTIAL AND COVERED BY THE ATTORNEY-CLIENT PRIVILEGE. IF YOU HAVE RECEIVED IT IN ERROR, PLEASE PERMANENTLY DELETE IT IMMEDIATELY**

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Thu, Jan 9, 2020 at 10:33 AM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <davidtylerbouffard@hotmail.com>, "Gloria Perez-Stewart (gloriaperez@gmail.com)" <gloriaperez@gmail.com>, "Hector PENA (hectorpena@ucla.edu)" <hectorpena@ucla.edu>, Magda Madrigal <magdamadrigal@earthlink.net>

Ira,

Thank you for your note.

I approve the full pay to be credited towards the tuition owed.

I have not yet sent in an alternative plan because my wife and I have not yet located the funds. We are working on it. I had planned to have something in this week, but it will likely not be completed until after the weekend.

As you are aware, I submitted an alternative payment plan, in essence a scholarship request, related to my 1L year August 29, 2019. This last email followed several earlier emails and a few phone calls indicating that I was experiencing an issue related to tuition this year in large part to medical bills incurred both during and at the culmination of my wife's pregnancy, as well as some tax debt.

The letter I sent was clear. Unfortunately, Hector has indicated that it was misread. In my later communication with Hector, the time frame was not re-iterated, and so his mistake was not uncovered. We both left that conversation believing the issue resolved and that Hector had the authority to resolve it.

Given the timing and the nature of the issue, as well as the considerable sum, please understand if it takes me a few more days to arrive at an approach I can commit to without further issue.

Thanks in advance to you and the Board.

My best to you all,

Todd

[Quoted text hidden]

---

**Gloria Perez-Stewart** <gloriaperez@gmail.com>

Thu, Jan 9, 2020 at 10:58 AM

To: Todd Hill <toddryangregoryhill@gmail.com>

Cc: Ira Spiro <ira@spirolawcorp.com>, "David Bouffard (davidtylerbouffard@hotmail.com)"

<davidtylerbouffard@hotmail.com>, "Hector PENA (hectorpena@ucla.edu)" <hectorpena@ucla.edu>, Magda Madrigal

<magdamadrigal@earthlink.net>

Thank you for explaining why it is delayed at the moment. As a woman who had a home birth in order to cut my own medical costs when I was self-employed and had no medical insurance, I understand the medical costs associated with a birth (and the corresponding loss of pay) and what you may be going through at this time.

Any sort of reduction to tuition is made by the board or executive committee - and to my knowledge has not been previously done. We have expected the tuition in full before approving any baby bar or bar exam - in fact, there was an issue just last July with someone who had been allowed to graduate but whom we did not approve for the bar exam until we received payment in full. (The board then had discussions regarding not allowing students to graduate without full payment in order to keep from having issues again so close to an exam and state bar deadlines.)

This is simply because our tuition is very low, does not afford us a profit, and current tuition just helps toward operating costs for PCL. I wish we had surplus funds for scholarships, but we just do not at this time. We are actively seeking grants to hopefully provide scholarships in the future.

Hector or whomever is acting as registrar is only authorized to work on payment plans with students. I apologize if that was unclear but of course we are willing to work with you on your payment plan as a result and look forward to seeing it soon to help resolve your issue.

Thank you,

Gloria

[Quoted text hidden]

---

**Ira Spiro** <ira@spirolawcorp.com>

Thu, Jan 9, 2020 at 4:13 PM

To: Gloria Perez-Stewart <gloriaperez@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <davidtylerbouffard@hotmail.com>, "Hector PENA

(hectorpena@ucla.edu)" <hectorpena@ucla.edu>, Magda Madrigal <magdamadrigal@earthlink.net>

I have to add that Hector told me he did not agree to the payment plan, whether for one quarter or a full year. In late August or very early September he sent it to me and I sent a different and faster payment plan back to him, but as I understand it, Hector never talked to Todd about payment plans after he got Todd's in very late August, not until last week. Also, to me the payment plan proposed by Todd last August was not clear that it meant for a whole year.

Ira

Case 2:23-cv-01298-JLS-BFM Document 255 Filed 03/31/25 Page 131 of 182 Page  
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**hector pena <hectorpena@ucla.edu>**

Thu, Jan 9, 2020 at 4:59 PM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: Gloria Perez-Stewart <gloriaperez@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, "David Bouffard (davidtylerbouffard@hotmail.com)" <davidtylerbouffard@hotmail.com>, Magda Madrigal <magdamadrigal@earthlink.net>

I read the proposal Todd mentioned (above) back in August, and again a few days ago. When I initially received it I sent it directly to Ira and assumed Liz Tang would take care of it, since that was part of her duties. Since then I don't recall having told to Todd whether I approved it or not. I know we had a few informal conversations about accountability and credit received for locking up but we never sat down and formalized the agreement.

Further, I was under the impression when I initially read it that the payment plan was for one quarter, and not the entire year. It was presented to me as being a payment plan, not a payment reduction or waiver of tuition. We have never waived a student's tuition and an individual board member does not have the authority to do so unilaterally.

But looking forward, Todd, I think the board should consider crafting an agreement that would stretch your payments until the beginning of the next academic year, which is August 2020. That should help alleviate a lot of the pressure and financial burden of rushing to get all the funds together.

After you craft that proposal It's important to have an in-person meeting with the administrator to sign this payment plan agreement. Once you have this ready please email it to the administrator and CC the executive committee.

-Héctor

[Quoted text hidden]

--  
**pronouns: He/Him/His**

**Héctor Candelario Peña Ramírez, J.D.**

Vice President of Board

Chair of Building Committee

Peoples College of Law

660 South Bonnie Brae Street

Los Angeles, CA 90057

"The limits of tyrants are prescribed by those whom they oppress."

- Frederick Douglass

**Todd Hill <toddryangregoryhill@gmail.com>**

Thu, Jan 9, 2020 at 5:00 PM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: Gloria Perez-Stewart <gloriaperez@gmail.com>, "David Bouffard (davidtylerbouffard@hotmail.com)" <davidtylerbouffard@hotmail.com>, "Hector PENA (hectorpena@ucla.edu)" <hectorpena@ucla.edu>, Magda Madrigal <magdamadrigal@earthlink.net>

Ira,

I will reiterate:

1. Hector and I did speak about the plan that I sent during our time together putting tarp on the roof. At that time I mentioned my appreciation, and that I did not anticipate any need for further assistance the following year. I did not receive any additional communications regarding this issue, and did not in fact know of this particular issue, until my conversation with you last week.

2. I suggest in the future that it be made clear to entering cohorts during the enrollment and contract signing period the roles, limits, and structure of the school. This is not, of course, a guarantee that issues such as these may arise in the future, but it is probably appropriately adopted as a best practice for student orientation.

3. It is clear that my initial communication was not handled appropriately. If there were questions about my communication at that time they should have been raised within a reasonable period of the receipt of my missive. As a student who made an earnest attempt to raise and resolve the matter, and reasonably considered this resolved, your implication that my recollection of the facts is inaccurate is undeserved. The reality is I likely deserve an apology; the back and forth about correspondence which I never received seems in the end to solely reinforce this particular point.

I truly appreciated Gloria's empathic and productive commentary about working together to find a path forward.

I look forward to doing so.

Todd

On Thu, Jan 9, 2020 at 4:14 PM Ira Spiro <[ira@spirolawcorp.com](mailto:ira@spirolawcorp.com)> wrote:

[Quoted text hidden]

**Todd Hill** <[toddryangregoryhill@gmail.com](mailto:toddryangregoryhill@gmail.com)>  
To: [hectorpena@ucla.edu](mailto:hectorpena@ucla.edu)

Thu, Jan 9, 2020 at 5:02 PM

Thanks Hector!

I appreciate the positive response.

I am working on a solution.

Todd

[Quoted text hidden]

**Ira Spiro** <[ira@spirolawcorp.com](mailto:ira@spirolawcorp.com)>  
To: Todd Hill <[toddryangregoryhill@gmail.com](mailto:toddryangregoryhill@gmail.com)>  
Cc: Gloria Perez-Stewart <[gloriaperez@gmail.com](mailto:gloriaperez@gmail.com)>, "David Bouffard (davidtylerbouffard@hotmail.com)" <[davidtylerbouffard@hotmail.com](mailto:davidtylerbouffard@hotmail.com)>, "Hector PENA (hectorpena@ucla.edu)" <[hectorpena@ucla.edu](mailto:hectorpena@ucla.edu)>, Magda Madrigal <[magdamadrigal@earthlink.net](mailto:magdamadrigal@earthlink.net)>

Thu, Jan 9, 2020 at 5:41 PM

Todd, I honestly don't know what to do in connection an apology. You have said Hector told you your proposal was accepted. He says he didn't talk to you about it after you sent it to him. One of you, maybe both, are mistaken in your recollections, but that's not a slight against either of you. People often make mistakes, me included of course.

But now that I write this, it comes home to me that according to what Hector says, nobody got back to you about your proposal. Well, someone should have, and for that I do apologize.

Todd, about PCL being clear about the roles, limits, and structure of the school, I think the tuition agreement is clear on that as far as payment and payment plans.

In any event, you're right, best thing is to find a path forward, and I hope that's accomplished by next week.

Ira

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**Todd Hill** <toddryangregoryhill@gmail.com>  
To: Ira Spiro <ira@spirolawcorp.com>

Tue, Apr 5, 2022 at 5:41 PM

Ira,

I was to be credited \$600 accountability (opening and locking up, study sessions, etc) \$600 for the additional work that year. \$600 for last year, and \$600 (pro rata) at the end of this year....total of \$2,400 in "overcharges" using your math.

Please correct your statements. In addition, even under your accounting the school owes me \$1800. Hard to imagine a nearly \$2000 overpayment from a guy you describe as "not liking to pay".

How did that happen?

todd

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Creo que su seguridad es una alta prioridad. Por lo tanto, he hecho un esfuerzo razonable para asegurarme de que el mensaje no contenga errores ni virus. Desafortunadamente, no se puede garantizar la seguridad total del correo electrónico ya que, a pesar de mis esfuerzos, los datos incluidos en los correos electrónicos podrían estar infectados, interceptados o dañados. Por lo tanto, el destinatario debe verificar el correo electrónico en busca de amenazas con el software adecuado, ya que el remitente no acepta responsabilidad por cualquier daño infligido al ver o manipular el contenido de este correo electrónico.

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----- Forwarded message -----

From: Ira Spiro <ira@spirolawcorp.com>

Date: Thu, Jan 9, 2020 at 8:42 AM

Subject: crediting pay against tuition

[Quoted text hidden]

[Quoted text hidden]

EXHIBIT 6



Todd Hill <toddryangregoryhill@gmail.com>

## Todd Hill's email chains

6 messages

Ira Spiro <ira@spirolawcorp.com> Sun, Nov 21, 2021 at 9:59 AM  
To: Todd Hill <toddryangregoryhill@gmail.com>, "David Bouffard (davidtylerbouffard@hotmail.com)"<DavidTylerBouffard@hotmail.com>, "Gary Silbiger (gsilbiger1@gmail.com)"<gsilbiger1@gmail.com>, "Gary Silbiger (gsilbiger@juno.com)"<gsilbiger@juno.com>, "Hector C. Pena Ramirez"<hpena@peoplescollegeoflaw.edu>, "Jessica Viramontes (chuyita.viramontes@gmail.com)"<chuyita.viramontes@gmail.com>, "Pascual Torres (pascualt0@yahoo.com)"<pascualt0@yahoo.com>, "Scott Bell (scottbell772@gmail.com)"<scottbell772@gmail.com>, "president@peoplescollegeoflaw.edu."<president@peoplescollegeoflaw.edu>, Anna Hawkins <pclhawkins@gmail.com>, "CarolJD@pacbell.net" <CarolJD@pacbell.net>, "Joshua Gillins Uosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Kevin Clinton <kevinclintonpro@gmail.com>, Nancy Popp <npopp@peoplescollegeoflaw.edu>, Prem Sarin <premantonio1@hotmail.com>, "dean@peoplescollegeoflaw.edu" <dean@peoplescollegeoflaw.edu>, hector pena <hectorpena@ucla.edu>, "Natalie Leonard (Natalie.Leonard@calbar.ca.gov)" <Natalie.Leonard@calbar.ca.gov>, "audrey.ching@calbar.ca" <audrey.ching@calbar.ca>, "GC@calbar.ca.gov" <GC@calbar.ca.gov>

I write because some of the people at the State Bar are new to Todd's email chains. I have not been associated with Peoples College of Law since August 13 of this year, the effective date of my resignation as dean. But yesterday I replied to an email he sent to most of you, and me. I wrote briefly about Todd's accusation that PCL's former board chair/president, who resigned because of Todd, violated Penal Code 632 because a recording was made of a board meeting held as a Zoom meeting. This is what I wrote yesterday:

Very sad that it has come to this. I hope everyone concerned is bearing in mind this part of Penal Code 632:

"(c) For the purposes of this section, "**confidential communication**" means any communication carried on in circumstances as may reasonably indicate that any party to the communication desires it to be confined to the parties thereto, **but excludes a communication made** in a public gathering or in any legislative, judicial, executive, or administrative proceeding open to the public, or in any **other circumstance in which the parties to the communication may reasonably expect that the communication may be overheard or recorded.**"

I was not at the Zoom board meeting in question, but I'm told that before the recording was started, it was announced to all that the meeting was going to be recorded. Also, when a Zoom recording starts, a notification appears on the screen of each participant showing that the meeting is about to be recorded. Given that, I'm wondering why anyone is thinking that this was not a "**circumstance in which the parties to the communication may reasonably expect that the communication may be ... recorded.**"

And today I add this in reply to Todd's latest email that included me, the one this morning, the morning of a board meeting.

As with any corporation, minutes of PCL board meetings are written up. They are distributed to people who did not attend the meetings - for example board members who did not attend, and others. The minutes, of course, include many communications made at the board meeting. Also, PCL is a membership corporation. The members include all students, faculty, officers, employees and many alumni. Some attend board meetings even though they are not board members. Thus, I am also wondering how anyone could be thinking that Section 632 could apply to the board meetings, since the statute requires that the communications at the meetings be "**carried on in circumstances as may reasonably indicate that any party to the communication desires it to be confined to the parties thereto.**"

*Ira Spiro, Attorney at Law*

*310-235-2350 NO TEXTS - phone is a land line*

*Please Correspond by Email Only*

*I do NOT promptly see U.S. Mail, FedEx, UPS, etc.*

*Los Angeles, Cal.*

*ira@spirolawcorp.com*

*website: spirolawcorp.com*

*pronouns: he*

---

**From:** Todd Hill <toddryangregoryhill@gmail.com>  
**Sent:** Sunday, November 21, 2021 8:57 AM  
**To:** "David Bouffard (davidtylerbouffard@hotmail.com)" <DavidTylerBouffard@hotmail.com>; "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>; "Gary Silbiger (gsilbiger@juno.com)" <gsilbiger@juno.com>; "Hector C. Peria Ramfrez" <hpena@peoplescollegeoflaw.edu>; "Jessica Viramontes (chuyita.viramontes@gmail.com)" <chuyita.viramontes@gmail.com>; "Pascual Torres (pascualtO@yahoo.com)" <pascualtO@yahoo.com>; "Scott Bell (scottbell772@gmail.com)" <scottbell772@gmail.com>; "president@peoplescollegeoflaw.edu." <president@peoplescollegeoflaw.edu>; Anna Hawkins <pcjhawkins@gmail.com>; CarolJD@pacbell.net; Ira Spiro <ira@spirolawcorp.com>; Joshua Gillins Uosh\_g19@yahoo.com <josh\_g19@yahoo.com>; Kevin Clinton <kevinclintonpro@gmail.com>; Nancy Popp <npopp@peoplescollegeoflaw.edu>; Prem Sarin <premantonio1@hotmail.com>; dean@peoplescollegeoflaw.edu; hector pena <hectorpena@ucla.edu>  
**Subject:** Fwd: our conversation today

My apologies; I missed some of the participants in the earlier sending of this email. See below: EXHIBIT 6, pg. 3 of 11  
 Email - Todd Dryang Gregory Hill ID# 8983

--- Forwarded message -----

From: Todd Hill <toddryangregoryhill@gmail.com>  
 Date: Sun, Nov 21, 2021 at 12:02 AM  
 Subject: Fwd: our conversation today  
 To: Leonard, Natalie <natalie.leonard@calbar.ca.gov>, Christina Gonzalez (christina.marin.gonzalez@gmail.com) <christina.marin.gonzalez@gmail.com>, Ira Spiro <ira@spirolawcorp.com>, hector pena <hectorpena@ucla.edu>, Anna Hawkins <pclhawkins@gmail.com>  
 CC: <audrey.ching@calbar.ca.gov>, David Bouffard (davidtylerbouffard@hotmail.com) <DavidTylerBouffard@hotmail.com>, Rebecca Hirsch <registrar@peoplescollegeoflaw.edu>, <CarolJD@pacbell.net>, <GC@calbar.ca.gov>

Dean Emeritus Spiro,

This communication is not privileged.

I have included Audrey Ching, whom Natalie Leonard has indicated is her direct supervisor. Ms. Ching's official title is Assistant Director of Admissions.

I have also taken the liberty of including CalBar's General Counsel, Vanessa Holton as well, since my request for ESCALATION to a Supervisor given that it has taken CalBar in excess of ONE HUNDRED AND TEN DAYS (110+) to affirm or deny the status of the school after a unit deviation from the guidelines was discovered.

I reference the email chain *infra* in the hopes that it may aid your recollection of both past events and prior substantive discussions directly covering your question related to criminal culpability for PC 632.

I was surprised by your question, as we had covered it so thoroughly in prior conversations.

Although I do not believe you would be estopped from claiming ignorance of the law, I doubt it would serve as a mitigator to the conduct here, since there is clear communication related to the issues.

Also, it is important to clarify that the Board is currently in violation of a lawfully executed demand for the production of documents. If there is no issue with the recording, I invite those who have access to the video to produce it.

Christina's use of rhetoric and hyperbole clearly lacks any substantive value. I assert that I have represented the facts to the best of my ability in good faith, I CLAIM THE ABSOLUTE DEFENSE OF THE TRUTH in regards to my allegations related to the reckless and very likely criminally culpable conduct of Christina Gonzalez.

In regards to any cease and desist requests from any party where I have made an allegation, I stand behind the integrity of the basis used to make any accusations as all resulted from some aspect of my fiduciary requirements, or at least I reasonably believed them to be.

I will NOT cease NOR will I desist until every lawful and appropriate avenue is pursued to hold any whose conduct did not adequately comport to the requirements of the circumstance(s)!

Finally, although it should not be necessary, under the circumstances I feel it necessary to remind Licensee of their absolute DUTY OF CANDOR TO THE TRIBUNAL.

Todd

Todd Hill <toddryangregoryhill@gmail.com>

Mon, Nov 22, 2021 at 11:54 AM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <DavidTylerBouffard@hotmail.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Gary Silbiger (gsilbiger@juno.com)" <gsilbiger@juno.com>, "Hector C. Pena Ramfrez" <hprena@peoplescollegeoflaw.edu>, "Jessica Viramontes (chuyita.viramontes@gmail.com)" <chuyita.viramontes@gmail.com>, "Pascual Torres (pascualtO@yahoo.com)" <pascualtO@yahoo.com>, "Scott Bell (scottbell772@gmail.com)" <scottbell772@gmail.com>, "president@peoplescollegeoflaw.edu." <president@peoplescollegeoflaw.edu>, Anna Hawkins <pclhawkins@gmail.com>, CarolJD@pacbell.net, "Joshua Gillins Uosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Kevin Clinton <kevinclintonpro@gmail.com>, Nancy Popp <npopp@peoplescollegeoflaw.edu>, Prem Sarin <premantonio1@hotmail.com>, dean@peoplescollegeoflaw.edu, hector pena <hectorpena@ucla.edu>, "Natalie Leonard (Natalie.Leonard@calbar.ca.gov)" <Natalie.Leonard@calbar.ca.gov>, GC@calbar.ca.gov, audrey.ching@calbar.ca.gov

Dean Emeritus Spiro,

I did not include CalBar staff re a PC 632 violation, although the simple answer to your inquiry is that the sovereign does not grant persons the right to charge and prosecute acts that carry criminal culpability. A right a person does not have cannot be alienated or waived by civil contract as it is exercised solely under the discretion of the Sovereign through authorized agents. A distinction of note is that the manner of consent for a corporation, a person as an entity, is through vote. Even were it the case that a third-party "adhesion contract" could in fact somehow avoid or constrain criminal liability by notice in the case of a natural person, in the case of an entity, no such claim can be made absent the presence of prior vote.

In addition, Dean Spiro, you actually included the reason why one would reasonably expect the meeting notes and comments to be "confidential"; by definition they were confined to a specific "membership", identified as the "Community". A private conversation between members of the same community, business, or other entity may ostensibly include any number of individuals. It is the privity of relationship that functions here to establish the expectation of privacy. Public policy would be averse to having things otherwise, as the goal is to avoid "the chilling effect" it may have on honest discourse.

**The reason I included staff in the chain was to hopefully accelerate what has now been in EXCESS OF ONE HUNDRED DAYS (100+) for what should have been a simple determination for the institutions (the incorrect award of 2 units for core topic courses instead of the guideline mandated 3), but I now believe is a much graver circumstance in character.**

The following issues require resolution:

1. PCLAdministration some time in the last four (4) years knew or should have known that the College was in material and substantial nonconformity to the Guidelines and Rules for Registered Institutions.
2. Members of the Administration either failed to inquire and/or inform both peer Board Members as well as the student body, while actively recruiting both students and members of the Board, and in fact sought to hide the fact of this nonconformity.
3. Members of the Administration entered into enrollment contracts with payment components that the students were to sign. No student to my knowledge was properly informed of, what I now believe is "more likely than not" the long term history of PCL's nonconformance.
4. When a student fell behind in payments, of which I am one, then the student was forced to sign a payment plan that included specific language that, even if the student later discovered the probable facts in this matter, the contract would likely harm not only the student's ability to seek recovery.
5. Nonstandard and "illegal" proprietary unit assignments made it impossible for students to transfer, since after transfer the student would require more time to meet the specific unit requirements for a degree. An example: Where the average student might acquire 36 quarter units, for the same hourly "workload" I would only be awarded two units.

The result here is that students who have passed the Baby Bar but have not yet discovered the nonconformance are trapped; since student sophistication generally increases over time, the system serves to essentially "trap" the student at the school with no way to readily avail themselves of recourse.

6. PCL's Administration is currently in violation of a lawfully executed demand for the production of documents. This is and of itself is an issue of noncompliance.

It can be difficult not to conflate the civil right of action granted to persons by the Sovereign versus the rights of punitive action, including the right to charge and, if convicted, receive admonishment under the supervision of the Sovereign.

To wit:

Strict compliance is important, but I can understand why facially this may seem like a minor issue; however, it was the unprecedented use of tactics to delay, deflect, deny, and in my opinion defame me that prompted a closer review and my duties to the organization that have moved me to act.

The core of my allegations, focusing just on the conduct and not any potential motives, are as follows:

1. PCL Administration knew or should have known that it had unlawfully deviated from CALBAR's statutorily authorized and enforceable guidelines when it introduced a proprietary quarterly unit, in DIRECT CONFLICT with Section 5.9 of the Rules for Unaccredited Law Schools, "Quantitative Academic Requirements", which explicitly defines credits to be issued in reference to associated hours of study.

The relevant portion of Section 5.9 makes it unequivocally clear that, "One quarter unit is defined as ten (10) hours of classroom instruction."

Here, I reiterate that PCL awards approximately 66% of the required quantity of units. For every 36 units a student in a compliant school would receive , our students receive 2.

2. PCL Administration, most specifically Hector Pena, knew or should have known that, in the case of deviations, pursuant to Section

The issue at hand for the Bar is what I believe to be an obvious DEVIATION FROM THE GUIDELINES THAT IS BARRED BY STATUTE AND CALBAR POLICY.

WHY HAS IT TAKEN THE BAR IN EXCESS OF 115 DAYS TO PROVIDE A CLARIFICATORY RESPONSE GIVEN THE SIMPLICITY OF THE QUESTION?

The issue before the Bar is the question of whether you knew or should have known during your tenure as Dean that an assignment for two (2) units per quarter class completed was insufficient.

THE SOVEREIGN HAS SOLE AUTHORITY TO CHARGE AND PROSECUTE ON BEHALF OF THE PEOPLE.

GENERALLY, the Sovereign, in its sole authority assigns or declines to issue charges related to issues defined in the penal code and/or other codes and statutes where criminal culpability has been expressly defined.

As one recalls, a core principle of American jurisprudence is the notion that standing to bring criminal action on behalf of the public is exclusively reserved to the Sovereign.

CONSEQUENTLY, A PERSON OR INDIVIDUAL CANNOT WAIVE WHAT IS ONLY THE SOVEREIGNS RIGHT TO MAKE, CHARGE, PROSECUTE, AND PUNISH THE CULPABLE.

There are likely many reasons for the PC 632 code to allow for the making of civil claims; I cede that in many cases the corequisite circumstances may not rise to the level the Sovereign wishes to expend effort to prosecute even though the law has been violated.

Another way to look at it might be:

THE SOVEREIGN GRANTS, REVOKEs, OR NEGATEs THE RIGHTS OF A PERSON TO MAKE A CIVIL CLAIM AT ITS OPTION WITHIN THE CONFINES OF THE CONSTITUTION.

THE SOVEREIGN NEVER GRANTS THE RIGHTS OF A PERSON TO MAKE NOR ENFORCE A CAUSE OF ACTION FOR CRIMINAL CULPABILITY.

CIVIL CLAIM AT ITS OPTION WITHIN THE CONFINES OF THE CONSTITUTION.

HERE THERE IS NO QUESTION OF THE CONDUCT

The shortest answer I can derive is that rights arising out of tort or other standard for civil action are excercisable at the option of the injured or aggrieved party, except in rare cases where standing has been determined by statute or precedent

I will attempt to answer your question here in short and succinct fashion. There are four (4) reasons the question around "consent" is generally considered a question for the judge to ascertain if a decision is to be made by the jury.

As we all recall, a core principal of American jurisprudence is the notion that standing to bring criminal action on behalf of the public is reserved to the Sovereign.

Here, we have an alleged PC 632 violation with the following elements:

1. No third-party, real or entity, can absolve an individual of their Sovereign-assigned

But there is a further principal, one of arguably equal import:

Finally, two hypotheticals to more explicitly illustrate the conduct and its resulting violative effects:

1.

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*I believe your security is a high priority. Therefore, I have made reasonable effort in ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite my efforts, the data included in emails could be infected, intercepted, or corrupted.*

*Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing or manipulation of the content of this email.*

*Please do not print this email unless it is necessary. Every unprinted email helps the environment.*

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Crea que su seguridad es una alta prioridad. Por lo tanto, he hecho un esfuerzo razonable para asegurarme de que el mensaje no contenga errores ni virus. Desafortunadamente, no se puede garantizar la seguridad total del correo electrónico ya que, a pesar de mis esfuerzos, Los datos incluidos en Los correos electrónicos podrían estar infectados, interceptados o dañados. Por lo tanto, el destinatario debe verificar el correo electrónico en busca de amenazas con el software adecuado, ya que el remitente no acepta responsabilidad por cualquier daño infligido al ver o manipular el contenido de este correo electrónico.

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필요한 경우가 아니면이 이메일을 인쇄하지 마십시오. 인쇄되지 않은 모든 이메일은 환경에 도움이됩니다.

[Quoted text hidden]

Ira Spiro <ira@spirolawcorp.com>

Mon, Nov 22, 2021 at 5:43 PM

To: Todd Hill <toddryangregoryhill@gmail.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <DavidTylerBouffard@hotmail.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Gary Silbiger (gsilbiger@juno.com)" <gsilbiger@juno.com>, "Hector C. Pena Ramrez" <hprena@peoplescollegeoflaw.edu>, "Jessica Viramontes (chuyita.viramontes@gmail.com)" <chuyita.viramontes@gmail.com>, "Pascual Torres (pascualtO@yahoo.com)" <pascualtO@yahoo.com>, "Scott Bell (scottbell772@gmail.com)" <scottbell772@gmail.com>, "president@peoplescollegeoflaw.edu." <president@peoplescollegeoflaw.edu>, Anna Hawkins <pcjhawkins@gmail.com>, "CarolJD@pacbell.net" <CarolJD@pacbell.net>, "Joshua Gillins Uosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Kevin Clinton <kevinclintonpro@gmail.com>, Nancy Popp <npopp@peoplescollegeoflaw.edu>, Prem Sarin <premantonio1@hotmail.com>, "dean@peoplescollegeoflaw.edu" <dean@peoplescollegeoflaw.edu>, hector pena <hectorpena@ucla.edu>, "Natalie Leonard

(Natalie.Leonard@calbar.ca.gov)" <Natalie.Leonard@calbar.ca.gov>, "GC@calbar.ca.gov" <GC@calbar.ca.gov>, "audrey.ching@calbar.ca.gov" <audrey.ching@calbar.ca.gov>

What? It's very hard to figure out what you're trying to say, Todd, especially in that first paragraph.

But please understand that expectation of privacy is not the only requirement for violation of PC 632 - that's plain from the words of the statute, which in my view show there was no violation.

Also, if you will look at the email chain you sent to State Bar staff and many others, you will see that you did include your PC 632 accusation and your other accusations of criminal activity.

In this reply I am deleting your email to me, below your second paragraph, and deleting the rest of that long email chain, because you've written those things before and because I believe I should not cause an email reiteration of your accusations.

*Ira Spiro*

**From:** Todd Hill <toddryangregoryhill@gmail.com>  
**Sent:** Monday, November 22, 2021 11:54 AM  
**To:** Ira Spiro <ira@spirolawcorp.com>  
**Cc:** David Bouffard (davidtylerbouffard@hotmail.com) <DavidTylerBouffard@hotmail.com>; Gary Silbiger (gsilbiger1@gmail.com) <gsilbiger1@gmail.com>; Gary Silbiger (gsilbiger@juno.com) <gsilbiger@juno.com>; Hector C. Pena Ramfrez <hpena@peoplescollegeoflaw.edu>; Jessica Viramontes (chuyita.viramontes@gmail.com) <chuyita.viramontes@gmail.com>; Pascual Torres (pascualt0@yahoo.com) <pascualt0@yahoo.com>; Scott Bell (scottbell772@gmail.com) <scottbell772@gmail.com>; president@peoplescollegeoflaw.edu. <president@peoplescollegeoflaw.edu>; Anna Hawkins <pcdhawkins@gmail.com>; CarolJD@pacbell.net; Joshua Gillins Oosh\_g19@yahoo.com) <josh\_g19@yahoo.com>; Kevin Clinton <kevinclintonpro@gmail.com>; Nancy Popp <npopp@peoplescollegeoflaw.edu>; Prem Sarin <premantonio1@hotmail.com>; dean@peoplescollegeoflaw.edu; hector pena <hectorpena@ucla.edu>; Natalie Leonard (Natalie.Leonard@calbar.ca.gov) <Natalie.Leonard@calbar.ca.gov>; GC@calbar.ca.gov; audrey.ching@calbar.ca.gov  
**Subject:** Re: Todd Hill's email chains

Dean Emeritus Spiro,

I did not include CalBar staff re a PC 632 violation, although the simple answer to your inquiry is that the sovereign does not grant persons the right to charge and prosecute acts that carry criminal culpability. A right a person does not have cannot be alienated or waived by civil contract as it is exercised solely under the discretion of the Sovereign through authorized agents. A distinction of note is that the manner of consent for a corporation, a person as an entity, is through vote. Even were it the case that a third-party "adhesion contract" could in fact somehow avoid or constrain criminal liability by notice in the case of a natural person, in the case of an entity, no such claim can be made absent the presence of prior vote.

In addition, Dean Spiro, you actually included the reason why one would reasonably expect the meeting notes and comments to be "confidential"; by definition they were confined to a specific "membership", identified as the "Community". A private conversation between members of the same community, business, or other entity may ostensibly include any number of individuals. It is the privity of relationship that functions here to establish the expectation of privacy. Public

policy would be averse to having things otherwise, as the goal is to avoid "the chilling effect" it may have on honest discourse.

EXHIBIT 6 pg. 9 of 11

[REST OF NOVEMBER 22 EMAIL FROM MR. HILL AND REST OF EMAIL CHAIN DELETED BY Ira Spiro]

Todd Hill <toddryangregoryhill@gmail.com>

Mon, Nov 22, 2021 at 6:10 PM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: "David Bouffard (davidtylerbouffard@hotmail.com)" <DavidTylerBouffard@hotmail.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Gary Silbiger (gsilbiger@juno.com)" <gsilbiger@juno.com>, "Hector C. Pena Ramirez" <hprena@peoplescollegeoflaw.edu>, "Jessica Viramontes (chuyita.viramontes@gmail.com)" <chuyita.viramontes@gmail.com>, "Pascual Torres (pascualt0@yahoo.com)" <pascualt0@yahoo.com>, "Scott Bell (scottbell772@gmail.com)" <scottbell772@gmail.com>, "president@peoplescollegeoflaw.edu." <president@peoplescollegeoflaw.edu>, Anna Hawkins <pcjhawkins@gmail.com>, CarolJD@pacbell.net, "Joshua Gillins Uosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Kevin Clinton <kevinclintonpro@gmail.com>, Nancy Popp <nopopp@peoplescollegeoflaw.edu>, Prem Sarin <premantonio1@hotmail.com>, dean@peoplescollegeoflaw.edu, hector pena <hectorpena@ucla.edu>, "Natalie Leonard (Natalie.Leonard@calbar.ca.gov)" <Natalie.Leonard@calbar.ca.gov>, GC@calbar.ca.gov, audrey.ching@calbar.ca.gov

Ira,

The matter for the bar were the points I reiterated related to the institutions noncompliance.

Please understand that I did not understand the entire scheme until Friday and my call with Natalie Leonard.

As for the clarity of my statement that basically gives the reason I cannot go down and slap cuffs on those I allege have participated in criminal activity. Vigilantism would make for terrible social policy.

I reiterate my prior suggestions that you seek counsel.

Todd

Clearly, as a lawyer, you do understand that the recording made without consent with the expectation of privacy is generally sufficient

[Quoted text hidden]

Ira Spiro <ira@spirolawcorp.com>

Mon, Nov 22, 2021 at 7:18 PM

To: Todd Hill <toddryangregoryhill@gmail.com>

Oh. But I still don't understand why you think it's worth explaining why you aren't going down and slapping cuffs on people.

Ira

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Mon, Nov 22, 2021 at 7:30 PM

To: Ira Spiro <ira@spirolawcorp.com>

Ira,

I really wish I could help you, but the realities here are pretty straightforward.

Todd

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*I believe your security is a high priority. Therefore, I have made reasonable effort in ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite my efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing or manipulation of the content of this email.*

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*Creo que su seguridad es una alta prioridad. Por lo tanto, he hecho un esfuerzo razonable para asegurarme de que el mensaje no contenga errores ni virus. Desafortunadamente, no se puede garantizar la seguridad total del correo electrónico ya que, a pesar de mis esfuerzos, Los datos incluidos en Los correos electrónicos podrían estar infectados, interceptados o dañados. Por lo tanto, el destinatario debe verificar el correo electrónico en busca de amenazas con el software adecuado, ya que el remitente no acepta responsabilidad por cualquier daño infligido al ver o manipular el contenido de este correo electrónico.*

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EXHIBIT 6, pg. 11 of 11

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필요한 경우가 아니면이 이메일을 인쇄하지 마십시오. 인쇄되지 않은 모든 이메일은 환경에 도움이됩니다.

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EXHIBIT 7

## ELECTION COMMITTEE REPORT

November 20<sup>th</sup>, 2021

### Committee Formation

**August 12, 2021-** Brian Godfrey texts Scott Bell with a request that Bell serve on the 2021 Election Committee (EC).

**August 15, 2021-** Bell attends the PCL Board Meeting to determine the timeframe of the 2021 Election and other members of the EC; Nancy Popp, Hector Sanchez and Pascual Torres are the names given to Bell.

**August 17, 2021-** Bell emails Popp, Sanchez and Torres to form the committee, stating that under PCL Bylaws at least three members are needed and there must be an odd number of members. Popp responds via email on 8/18/21 affirming her participation as a voting member of the EC. Sanchez and Torres respond on 8/21/21 requesting a meeting to discuss. A meeting is scheduled for 9/3/21; all four agree to attend.

**September 3, 2021-** Bell and Popp meet as scheduled; Sanchez and Torres do not attend. Popp and Bell lay out an election timeline for nominations/statement submission/voting. Bell agrees to update the Notice of Election, send it by email and create a ballot. Popp takes notes and send them by email to all four parties.

**September 4, 2021-** Sanchez emails apologizing for missing the 9/3/21 meeting. Torres does not respond.

### Election Preparation/Execution

**September 11, 2021-** Bell emails an updated Notice of Election to all four parties for review. Torres replies with edits the same day; Sanchez and Popp respond the following day, 9/12/2021.

**September 12, 2021-** Bell emails the Election Notice to the PCL Community from a list given to him by Magda Madrigal for the 2020 election.

**September 14-15, 2021-** Bell is notified by Brian Godfrey that current 1L's did not receive the Election Notice. He is provided a list of current 1L contact info by Hector Peña.

**September 21, 2021-** Bell emails the Election Notice to the current PCL 1L class per Peña's request after receiving their emails from Peña. This decision was not brought to the EC.

**September 26, 2021-** Bell emails Popp, Sanchez and Torres a list of PCL Board Candidate nominees.

**September 28, 2021-** Interim Dean Juan Flores requests an extension for Board Nominations/Statements from the 1L class, followed by a request from 1L Juan Flores.

Source: [https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp\\_peoplescollegeoflaw\\_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg](https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp_peoplescollegeoflaw_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg)

**September 29, 2021-** Bell emails Popp, Sanchez and Torres the request for extension of nominations. All three respond via email the same day confirming the extension of nominations and submission of candidate statements from 9/26/21 until 10/3/2021.

**September 30, 2021-** Bell sends an email to all nominees affected by the delayed notice with a deadline for Statements of 10/3/2021 at 6pm PST, stating that due to the 3.5 day turnaround, there will be leeway granted for late submissions.

**October 4, 2021-** Bell receives an email from Todd Hill the morning after the deadline asking if he can still send a candidate statement. Bell forwards this email to the committee asking if anyone objects. Later that same day, Bell receives a self-nomination and candidate statement from Hill.

**October 5, 2021-** Bell, Popp and Sanchez vote by email to accept the late submission from Hill, fulfilling the three-member vote for the EC. Torres objects.

**October 8, 2021-** Bell sends the PCL Board Election ballot out via email; voting ends 10/15/2021.

**October 15, 2021-** Bell emails PCL Election results to the Community.

### **Post-Election Conflict**

**October 16, 2021-** Bell receives an email from Hector Peña stating that he spoke to Sanchez and Torres about the legitimacy of Todd Hill's nomination, asking Bell about the date of Hill's nomination. Bell responded in detail with dates of Hill's nomination/statement email, CC'ing Popp, Hill, Sanchez, and Torres. Peña requests to bring the matter before the PCL Board at the next day's meeting. Hill responds stating there is a Conflict of Interest at stake in the inquiry and that he self-nominated when submitting his statement. There is a conflictual email exchange between Peña, Torres, Bell and Hill.

**October 17, 2021-** Bell requests an 'Emergency' Meeting of the EC via email to Popp, Sanchez, Torres around 9:10am. Sanchez, Torres and Bell meet at 10:51 am without awaiting a response from Popp, and three vote to disqualify Hill's nomination and statement as 'untimely' and reverse his election from the PCL Board. Bell attends part of the PCL Board Meeting that day to report the EC's 'decision'. Popp contacts Bell via text/phone around 1pm, explaining she was away from phone/computer due to a regular Sunday personal commitment. Popp asks why the meeting occurred without her as a voting member, and states that according to common courtesy (and PCL Bylaws) there was no need for an Emergency Meeting.

Popp emails Bell, Sanchez and Torres at 3:31pm stating that the meeting/vote was improper, given she was not allowed to participate as a voting member of the EC, and requesting the meeting be rescheduled.

Bell emails Popp, Sanchez and Torres at 4:51pm stating the PCL Board requests a report from the EC Committee about their decisions; all agree to contribute to the report. Bell also seeks an extension of Formal Complaints or Appeals regarding the election to 10/27/21. Popp, Sanchez and Torres agree to the extension.

**October 28, 2021-** Bell submits an initial draft of the EC Report via email to Popp, Sanchez, and Torres.

Source: [https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp\\_peoplescollegeoflaw\\_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg](https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp_peoplescollegeoflaw_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg)

Popp responds with concerns that the report does not address the status of Torres on the EC and whether he was actual voting member, given the EC was limited to 3 or 5 members per PCL's Bylaws. Popp also states that Peña's inquiry was not a Formal Complaint that would allow the EC to vote on whether or not to change the election results. Torres objects, while Bell agrees with Popp about the 10/17/21 meeting's status.

**October 30, 2021-** Discussions continue over email between Bell, Popp, Sanchez and Torres on how to report the EC's actions to the PCL Board. Popp and Bell note multiple violations of the PCL Bylaws in the election's planning and execution, and Bell suggests deeming the election invalid and holding another election.

**November 16, 2021-** Email discussions continue over email between Bell, Popp, and Torres with little input from Sanchez after a pause for Bell to sit for the MPRE. Revisions to Bell's draft report are submitted by Popp but not included by Bell in their entirety.

The sections of the PCL Bylaws in question are:

SECTION 9.2 - ELECTIONS TO THE PCL BOARD

9.2.a "Open nominations will be held throughout the month of October."

9.2.e "Elections are held no later than the last day of November."

9.6.a "The Community Board will appoint an Election Committee to supervise any regular or special election...it must have no less than 3 members or an odd number of members."

SECTION 9.8 - ELECTION PROTESTS or APPEALS

9.8.a "Any affected member may protest...the eligibility of a candidate...shall be made by complaint in writing to the respective Election Committee...prior to, during or within 10 days of the election."

9.8.b "The committee shall consider/investigate the complaint and attempt to resolve the protest or come to a decision within 10 days after receipt of the complaint."

9.8.c "All appeals must set forth the exact nature and specifications of the complaint and how the alleged infractions affected the outcome of the election."

9.8.d "All elected board members and officers shall resume their duties and responsibilities after their respective election regardless of whether the election has been protested. They will remain in their respective office under their terms expire or until newly elected Board Members are elected as a result of an ordered rerun election or a decision on complaint or appeal by the Election Committee or Community Board."

Since there is a difference of opinion amongst Bell, Popp, Sanchez, and Torres on how these Bylaws apply to the actions taken by the EC, there is not a version of an EC report that can be submitted with the participating parties in agreement. The discussions have been heated at times and questions remain whether Torres was in fact an official voting member of the EC, whether there was a Complaint submitted by Hector Peña, the validity of the October 17<sup>th</sup> EC meeting held on short notice without all EC members in attendance when there was no emergency deadline to do so, and if the EC's actions to change an election result that removed an elected Board Member were unsanctioned by or in violation of PCL's Bylaws.

Signed,

Source: [https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp\\_peoplescollegeoflaw\\_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg](https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp_peoplescollegeoflaw_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg)

Nancy Popp, 2L  
npopp@peoplescollegeoflaw.edu

Source: [https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp\\_peoplescollegeoflaw\\_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg](https://peoplescollegeoflaw0-my.sharepoint.com/:w/g/personal/npopp_peoplescollegeoflaw_edu/ER1p3VGvkyJApICwi71QHeoB-IXG1eSQssROQ53bnWWPOQ?rtime=bAHpoRAU2kg)



Todd Hill <toddryangregoryhill@gmail.com>

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## Fw: Appeals process

1 message

**Nancy Popp** <npopp@peoplescollegeoflaw.edu>  
To: Todd Hill <toddryangregoryhill@gmail.com>

Sat, Nov 20, 2021 at 12:53 PM

FYI

--

Nancy Popp  
People's College of Law, 2L ('24)

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**From:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Sent:** Saturday, November 20, 2021 12:51 PM  
**To:** Scott Bell <scottbell772@gmail.com>; P Torres <pascualt0@yahoo.com>  
**Cc:** hector sanchez <hsan213@yahoo.com>  
**Subject:** Re: Appeals process

I have written a simplified timeline of the actions of the EC around the 2021 Election; it is attached as a Word doc and here is a link to the timeline in OneDrive.

I hope this will be a simpler way to describe the facts and the violations to the PCL Bylaws that have occurred. I would want this report submitted alongside whatever you submit to the PCL Board, Scott.

The Bylaws are there when disagreement arises; as any Contract does, the Bylaws point a way forward on agreed-to standards of action when disagreements arise between parties. Let the Bylaws be our guide, that is what they are there for.

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Nancy Popp  
People's College of Law, 2L ('24)

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**From:** Scott Bell <scottbell772@gmail.com>  
**Sent:** Saturday, November 20, 2021 9:28 AM  
**To:** P Torres <pascualt0@yahoo.com>  
**Cc:** Nancy Popp <npopp@peoplescollegeoflaw.edu>; hector sanchez <hsan213@yahoo.com>  
**Subject:** Re: Appeals process

And, I'd like to add, the idea of submitting a majority vote report sits particularly uncomfortably with me if the vote is 3-1 with Nancy as the vote against, because her voice was excluded in the decision to reject Todd's nomination. I'd really like to find a way to include it in the report.

On Sat, Nov 20, 2021 at 9:19 AM Scott Bell <scottbell772@gmail.com> wrote:

I suppose we can do a majority vote report, but my goal throughout is to come up with something all 4 of us could agree to, but as I said elsewhere, that may not be possible.

On Sat, Nov 20, 2021 at 7:01 AM <pascualt0@yahoo.com> wrote:

Yes, but I'll prefer we vote on the report that was almost complete and submit the report and vote.

Pascual

On Friday, November 19, 2021, 12:50:53 PM PST, Scott Bell <scottbell772@gmail.com> wrote:

Would everyone be willing to agree to a very short statement rather than a full report; something like.

ID #:8998

"After the election to People's College of Law occurred, an alleged issue regarding the timeliness of Todd Hill's nomination was raised informally by non-committee member, Hector Pena, via email. On October 17, 2021, a meeting of the Election's Committee was held to conduct a vote on the alleged issue. Scott Bell, Pascual Torres, and Hector Sanchez voted unanimously to reject Todd's nomination as untimely. Committee member, Nancy Popp was not present at the meeting due to it being put together in less than two hours and therefore never receiving notice. Ms. Popp believes that the meeting was invalid and should have no effect for failure to follow any process described in the People's College of Law bylaws. Specifically, the "Election Protest and Appeals" process described in Section 9.8 of the bylaws was not followed and any vote that changed a result of the election can only be valid if it followed this process. Ms. Popp also believes that Pascual was a non-voting member of the committee and that Pascual voted in her stead on October 17. A variety of opinions are held by the individual members of this committee on these issues and, as a unit, we cannot and will not offer an opinion. However, to determine the current membership of PCL's a decision of these matters will have to be made. The individual members of the committee are available to answer questions should they arise."

On Thu, Nov 18, 2021 at 10:02 PM Scott Bell <scottbell772@gmail.com> wrote:

Re: This is your interpretation - 100% and I don't propose we include it in the report. We should be saying what actions were taken and occurred as a result. Whether an election was rescinded or a decision was retroactively applied doesn't need to be weighed in on. It can just be "On [date], the committee held a vote on [issue]. [present members] were present. The result of that vote was [result]"

Re: Interpretation is discussing the difference 'between "not sanctioned by" and "in violation of." - I disagree. These things have concrete definitions. If we do something the bylaws say we can't we're "in violation of". If we do something the bylaws doesn't say we can we're "not sanctioned by"

Re: The fact is I was not informed of the Oct 17th meeting in time to attend nor was I allowed to vote. - The draft report states these facts.

I'm starting to believe that the only solution is to tell the board that due to disagreements within the committee no report is possible to be produced.

On Thu, Nov 18, 2021 at 9:39 PM Nancy Popp <npopp@peoplescollegeoflaw.edu> wrote:

See below.

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Nancy Popp  
People's College of Law, 2L ('24)

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**From:** Scott Bell <scottbell772@gmail.com>  
**Sent:** Thursday, November 18, 2021 9:14 PM  
**To:** Nancy Popp <npopp@peoplescollegeoflaw.edu>  
**Cc:** P Torres <pascualt0@yahoo.com>; hector sanchez <hsan213@yahoo.com>  
**Subject:** Re: Appeals process

Thanks. I still don't think we can call these facts.

First, referring to what occurred as "rescinding Todd's election" is, I think, an inaccurate description of what happened. But it's definitely an interpretation of what happened, not a fact. In effect, it resulted in an election result being changed, but it was a ruling on an issue that should have been ruled on prior to the election and retroactively applying it.

This is your interpretation; the fact is Todd was nominated, elected, and his election was rescinded. The Committee did rule on the issue of Todd's nomination/statement via email prior to October 8th. Todd's email stated he was self-nominating. These are the facts.

Second, there's a difference between "not sanctioned by" and "in violation of." It's possible that, either way, the meeting was invalid. I'm willing to put in the report that the meeting of 10/17 was "not sanctioned by" the bylaws as a fact, because that's undeniably true. Nothing in the bylaws gave us the right to hold that meeting, but I don't see that it is forbidden either. I'm not willing to say it was in violation of the bylaws or to say that the meeting was invalid or had no effect as facts. Those statements are conclusions that can only be reached by interpreting the facts in a certain manner. I don't think it's an unreasonable interpretation, but I know we aren't unified in that interpretation. So, it can't be included as a fact, because it's a conclusion. It can't be included as a conclusion, because it's not agreed between us.

ID #:8999

The 10/17 meeting was essentially held without cause because there was no formal complaint or challenge to the election which would predicate a calling of such a meeting- this is a fact. Yet the EC met on two hours without a viable member and made a decision that overturned an election result- this is also a fact. These are facts, not interpretations. Interpretation is discussing the difference between "not sanctioned by" and "in violation of."

Third, pretty much the same argument as #2. Saying that one of the members needed to have been a non-voting member is perhaps a correct interpretation of the bylaws, but it's an interpretation. Personally, I think it's more dire than that. The bylaws don't sanction an even numbered committee provided only an odd number are voting members. So, even if there had been a non-voting member, the committee would be out of compliance. However, further, I believe it's counterfactual. Regardless of what was allowed by the bylaws, no one ever agreed to be a non-voting member. Other than a suggestion that someone be a non-voting member that wasn't responded to, the subject was never brought up. I never assumed that any member was a non voting member when holding votes. Having a four member committee was almost certainly a violation of the bylaws, but that doesn't mean we can retroactively pretend that someone was considered a non-voting member to feign compliance. To get abstract about it, we are each equally the extra member; we can't choose one based on a specific order of responses in an email chain and determine "so, that's the one that doesn't count." Scott, we had this discussion in writing via email at the formation of the committee on August 7th. The fact that the committee was limited to 3 persons was laid out. The fact is that I responded confirming I was a voting member of the committee. The fact is I was not informed of the Oct 17th meeting in time to attend nor was I allowed to vote. These are facts. Rotating votes between members of a committee whose size is not in compliance with PCL's Bylaws means that committee's votes/decisions are out of compliance with the Bylaws. That is a fact.

I know you feel strongly that these must be included. I'm happy to, concurrently with the submission of this report, also submit a document that would be named something like "Additional Statement of Nancy Popp." or if we really can't get to something you're willing to sign off on, we can, rather than a unified report, do a "Statement of Scott Bell, Pascual Torres, and Hector Sanchez" and "Statement of Nancy Popp."

I'm sorry that we seem to be at odds here regarding the clear facts of what occurred. I prefer to describe what happened in simple and clear terms. Otherwise, it looks like we are hiding something or trying to cover our asses, or pandering to others who want a certain result.

To be honest, I feel this issue is being beaten to death. It seems there is a fear of simply describing what occurred.

On Thu, Nov 18, 2021 at 8:27 PM Nancy Popp <npopp@peoplescollegeoflaw.edu> wrote:

Per your request, Scott:

PCL Bylaws 5/22/2017

#### SECTION 9.2

"Open nominations will be held throughout the month of October."

*Since the Bylaws state that nominations can be accepted throughout the month of October, this is an indication that Todd's self-nomination on October 4th would be acceptable.*

9.2.e "Elections are held no later than the last day of November."

*The 2021 Election was held October 8th- 15th. In other words, there was no rush and extensions were allowable under the Bylaws.*

9.6a "The Community Board will appoint an Election Committee to supervise any regular or special election...it must have an odd number of members."

*Scott, you argue we had four members on the EC- yourself, Hector, me and Pascual. There should only be 3 or an odd number. Therefore, one member would not be officially part of the committee, or at minimum, a non-voting member. Since both Scott and myself voiced our active participation, that would mean either Hector or Pascual would be the unofficial or non-voting member.*

9.8 Election Protests or Appeals

ID #:9000

9.8.a."Any affected member may protest...the eligibility of a candidate...shall be made by complaint in writing to the respective Election Committee...prior to, during or within 10 days of the election."

9.8.b "The committee shall consider/investigate the complaint and attempt to resolve the protest or come to a decision within 10 days after receipt of the complaint."

9.8.c. "All appeals must set forth the exact nature and specifications of the complaint and how the alleged infractions affected the outcome of the election."

*No such complaint in writing was received, only an email inquiring to the timing of existence of Todd's nomination after the fact. Since there was no formal complaint that laid out the exact nature and specifications of an infraction, the Election Committee overstepped in reversing an earlier decision to accept Todd's nomination/statement. The October 17th meeting was not an 'emergency' meeting as no formal complaint was filed; even if there was a formal complaint, the Committee had 10 days to meet to discuss.*

9.8.d "All elected board members and officers shall resume their duties and responsibilities after their respective election regardless of whether the election has been protested. They will remain in their respective office under their terms expire or until newly elected Board Members are elected as a result of an ordered rerun election or a decision on complaint or appeal by the Election Committee or Community Board."

*Todd is allowed to continue on the Board for the duration of his term. Since there has been no formal complaint or appeal by either Hector or Todd, only an email inquiry by Hector, the election has not been formally challenged.*

--

Nancy Popp

People's College of Law, 2L ('24)



Election Committee Report\_POPP v3.docx

20K

EXHIBIT 8



Todd Hill <toddryangregoryhill@gmail.com>

## List of People to Recognize

11 messages

hector pena <hectorpena@ucla.edu>

Wed, Apr 28, 2021 at 5:29 PM

To: steve zrucky <stovitzrucky@yahoo.com>, Ira Spiro <ira@spirolawcorp.com>, Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>

Can you all please take a look at this list and let me know who is missing from those who need to be recognized? This will be the finalized list of folks Christina will be reading from. Thank you!

### Call Squad

Ellen Jacobs  
Robby Stovitz  
Ira Spiro  
Gary Silbiger  
Brian Godfrey  
Hector Candelario Peiia Ramfrez  
Christina Gonzalez  
Jessica Viramontes  
David Bouffard  
Alba Marrero-Thorpe  
Sarah Wild  
Freda Perel

### T-Shirt Fulfillment

Steve Zrucky

### Photos/Collecting Historical Documents

Dana Schumacher

### Event Book

Deborah Willis

### KPFKShow

Teresa Sanchez-Gordon  
Jeff Cohen  
Maria Elena Durazo  
Michael Bodaken  
Carlos Holgufn

### Film/Production/Interview/Editing

Naomi Cruz  
Juan Arroyo

### Musical Acts

Andrea Zuniga - singer  
Luis Lopez - Guitarist  
Ariel Westberg  
Scott Bruzenak

--  
**pronouns: He/Him/His**  
**Hector Candelario Pena Ramfrez, J.D.**

"The limits of tyrants are prescribed by those whom they oppress."  
- Frederic Douglass

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hector pena <hectorpena@ucla.edu>

Wed, Apr 28, 2021 at 5:30 PM

To: steve zrucky <stovitzrucky@yahoo.com>, Ira Spiro <ira@spirolawcorp.com>, Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>, Sarah Wild <sarahkwild@gmail.com>

Sorry, forgot to include Sarah!

**Call Squad**

Ellen Jacobs  
Robby Stovitz  
Ira Spiro  
Gary Silbiger  
Brian Godfrey  
Hector Candelario Pena Ramfrez  
Christina Gonzalez  
Jessica Viramontes  
David Bouffard  
Alba Marrero-Thorpe  
Sarah Wild  
freda perel  
[Quoted text hidden]  
(Quoted text hidden)

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Sarah Wild <sarahkwild@gmail.com>

Wed, Apr 28, 2021 at 5:49 PM

To: hector pena <hectorpena@ucla.edu>  
Cc: steve zrucky <stovitzrucky@yahoo.com>, Ira Spiro <ira@spirolawcorp.com>, Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>

About the KPFK Show, I don't think that Teresa Sanchez-Gordon or Maria Elena Durazo were able to do it, were they?

**KPFKShow**

Teresa Sanchez-Gordon  
Jeff Cohen  
Maria Elena Durazo  
Michael Bodaken  
Carlos Holgufn

Additionally, I think Todd also made phone calls?

Sarah

[Quoted text hidden]

--  
Sarah Wild, MPA, CFRE  
(619)436-7161

---

**steve zrucky** <stovitzrucky@yahoo.com>

Wed, Apr 28, 2021 at 6:42 PM

To: hector pena <hectorpena@ucla.edu>

Cc: Ira Spiro <ira@spirolawcorp.com>, Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>, steve zrucky <stovitzrucky@yahoo.com>

hi all, I did not see susan millmann's name as a volunteer who made calls. also, are we going to recognize Maria Elena durazo and Teresa Sanchez Gordon for the kpfk program although they did not speak nor were they mentioned on the kpfk program as guests. thanks, Robby

Sent from my iPad

On Apr 28, 2021, at 5:30 PM, hector pena <hectorpena@ucla.edu> wrote:

[Quoted text hidden]

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**Ira Spiro** <ira@spirolawcorp.com>

Wed, Apr 28, 2021 at 6:47 PM

To: steve zrucky <stovitzrucky@yahoo.com>, hector pena <hectorpena@ucla.edu>

Cc: Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>

They weren't on the KPFK program. The program guests were Jeff Cohen, Carlos Holguin and Michael Bodaken

*Ira*

[Quoted text hidden]

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**Ira Spiro** <ira@spirolawcorp.com>

Thu, Apr 29, 2021 at 11:22 AM

To: Sarah Wild <sarahkwild@gmail.com>, hector pena <hectorpena@ucla.edu>

Cc: steve zrucky <stovitzrucky@yahoo.com>, Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Brian Godfrey <cityoffantastic@yahoo.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Deborah Willis <dhwillis@ca.rr.com>, Todd Hill <toddryangregoryhill@gmail.com>

Right, Teresa and Maria Elena weren't able to be on the show.

*Ira*

---

**From:** Sarah Wild <sarahkwild@gmail.com>

**Sent:** Wednesday, April 28, 2021 5:49 PM

**To:** hector pena <hectorpena@ucla.edu>

**Cc:** steve zrucky <stovitzrucky@yahoo.com>; Ira Spiro <ira@spirolawcorp.com>; Christina Gonzalez

<christina.marin.gonzalez@gmail.com>; Brian Godfrey <cityoffantastic@yahoo.com>; Gary Silbiger (gsilbiger1@gmail.com) <gsilbiger1@gmail.com>; Deborah Willis <dhwillis@ca.rr.com>; Todd Hill <toddryangregoryhill@gmail.com>

**Subject:** Re: List of People to Recognize

About the KPFK Show, I don't think that Teresa Sanchez-Gordon or Maria Elena Durazo were able to do it, were they?

[Quoted text hidden]

[Quoted text hidden]

**Christina Gonzalez** <christina.marin.gonzalez@gmail.com>

Thu, Apr 29, 2021 at 11:34 AM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: Brian Godfrey <cityoffantastic@yahoo.com>, Deborah Willis <dhwillis@ca.rr.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Sarah Wild <sarahkwild@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, hector pena <hectorpena@ucla.edu>, steve zrucky <stovitzrucky@yahoo.com>

I thought we decided after last night's rehearsal that there were so many volunteer/donor names to individually thank them and I would therefore give a shout-out to the major donors (and, if time permits, read all the donor names)?

(Quoted text hidden)

--  
Sent from my iPhone

**Christina Gonzalez** <christina.marin.gonzalez@gmail.com>

Thu, Apr 29, 2021 at 11:49 AM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: Brian Godfrey <cityoffantastic@yahoo.com>, Deborah Willis <dhwillis@ca.rr.com>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, Sarah Wild <sarahkwild@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, hector pena <hectorpena@ucla.edu>, steve zrucky <stovitzrucky@yahoo.com>

And before recognizing donors, I planned to generally thank all the volunteers with something like "Thank you to all the volunteers that helped coordinate this event and make it as successful as it's been ... they helped with everything from making phone calls, sending emails, filming and editing the wonderful interviews you saw tonight, creating the beautiful ad/event book, and setting up the very technical virtual event!" This is based on comments received last night after rehearsal.

Either way, I'm happy to say the names of all volunteers AND all donors if folks think it's necessary. Please let me know.

My opinion is that these people, at the very minimum, require a personalized thank you:

1. Ira Spiro for work as the Dean (and as a donor)
2. Anna Hawkins for work as the Administrator (though she didn't help much with the event, she has done a lot of work as the only paid staff of PCL especially with transitioning to virtual classes, etc.)
3. Top 2 highest tiers of donors

Again, please let me know what the general consensus is so I can prepare. Thank you!

[Quoted text hidden]

**Gary Silbiger** <gsilbiger1@gmail.com>

Thu, Apr 29, 2021 at 2:22 PM

To: Christina Gonzalez <christina.marin.gonzalez@gmail.com>

Cc: Ira Spiro <ira@spirolawcorp.com>, Brian Godfrey <cityoffantastic@yahoo.com>, Deborah Willis <dhwillis@ca.rr.com>, Sarah Wild <sarahkwild@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, hector pena <hectorpena@ucla.edu>, steve zrucky <stovitzrucky@yahoo.com>

I'm recommending that all the volunteers for this celebration should be named at some part of the program. If this would be a live celebration, the volunteers' names might be stated or they could be asked to stand. I suppose this Celebration's

volunteers could stand, but how many people would see them?

Gary Silbiger  
(310) 837-2667  
[Quoted text hidden]

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**hector pena** <hectorpena@ucla.edu>  
To: Gary Silbiger <gsilbiger1@gmail.com>  
Cc: Christina Gonzalez <christina.marin.gonzalez@gmail.com>, Ira Spiro <ira@spirolawcorp.com>, Brian Godfrey <cityoffantastic@yahoo.com>, Deborah Willis <dhwillis@ca.rr.com>, Sarah Wild <sarahkwild@gmail.com>, Todd Hill <toddryangregoryhill@gmail.com>, steve zrucky <stovitzrucky@yahoo.com>

Thu, Apr 29, 2021 at 2:48 PM

Under the current Seminar mode, we do not have the ability to show individual participants.

-hp  
[Quoted text hidden]

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**Todd Hill** <toddryangregoryhill@gmail.com>  
To: Kevin Clinton <kevinclintonpro@gmail.com>

Sun, Nov 28, 2021 at 12:30 AM

Hector includes himself, Ira, and Christina on a donor prospect call list.

They knew at the time of the status of the school, Fraud.

Where did the money go to?

Todd  
[Quoted text hidden]



Todd Hill <toddryangregoryhill@gmail.com>

## Tuition

10 messages

**David Bouffard** <davidtylerbouffard@hotmail.com>  
To: "toddryangregoryhill@gmail.com" <toddryangregoryhill@gmail.com>  
Cc: "jorgenegrete1954@gmail.com" <jorgenegrete1954@gmail.com>

Thu, Mar 10, 2022 at 1:18 PM

Hi Todd,

It appears that you haven't yet paid the Spring tuition. Please address this at your earliest convenience.

Thank you,

David

Sent from my iPhone

**Todd Hill** <toddryangregoryhill@gmail.com>  
To: David Bouffard <DavidTylerBouffard@hotmail.com>  
Cc: CarolJD@pacbell.net, "Fletcher, Jeremiah J." <j3fletch@lasd.org>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Joshua Gillins Uosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, hector pena <hectorpena@ucla.edu>, "jorgenegrete1954@gmail.com" <jorgenegrete1954@gmail.com>  
Bcc: "Fletcher, Jeremiah J." <j3fletch@lasd.org>

Thu, Mar 10, 2022 at 1:59 PM

David,

I have included the Board since all should be aware of the issues.

As I have clearly indicated in numerous prior requests asking for an accounting and records, the "appearance" of any outstanding debt not, in fact, owed to me is erroneous; the only source I can imagine for the "appearance" is Populi, a system that I do not believe has ever been properly reconciled.

It seems extraordinarily difficult to me that you have received both monies from me through threat. ...and that you all still have FALSE AND DEFAMATORY statements about me on the web site .....and the audacity mention the "appearance" of the debt as if it was a problem for me, and not the school, to resolve.

Will you be able to provide a reasonable accounting? Have you resolved the issues with the credit I should have received but now did not... twice?

Without those things how is this not just extortion?

I stand ready, willing, and able to pay any and all outstanding obligations I have to the People's College of Law.

Conversely, the college has not met any of its commitments, duties, or obligations around this reporting.

Also, I will mention the COi issues that clearly present themselves here.

Finally, I refer to my earlier statements related to evidence preservation and the requirements re spoliation; generally, non-recoverable evidence last in the control of the a party is generally imputed against that party.

What do you suggest as the best course of action? I have prior requested assurances.

I look forward to your response.

Todd

[Quoted text hidden]

**Confidentiality Notice**

*The content of this email is confidential and intended for the recipient specified in the message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.*

*I believe your security is a high priority. Therefore, I have made reasonable effort in ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite my efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing or manipulation of the content of this email.*

*Please do not print this email unless it is necessary. Every unprinted email helps the environment.*

**Aviso de confidencialidad**

*El contenido de este correo electrónico es confidencial y está destinado específicamente al destinatario especificado en el mensaje. Esta estrictamente prohibido compartir cualquier parte de este mensaje con terceros, sin el consentimiento por escrito del remitente. Si recibió este mensaje por error, responda a este mensaje y continue con su eliminación, para que podamos asegurarnos de que ese error no ocurra en el futuro.*

*Creo que su seguridad es una alta prioridad. Por lo tanto, he hecho un esfuerzo razonable para asegurarme de que el mensaje no contenga errores ni virus. Desafortunadamente, no se puede garantizar la seguridad total del correo electrónico ya que, a pesar de mis esfuerzos, los datos incluidos en los correos electrónicos podrían estar infectados, interceptados o dañados. Por lo tanto, el destinatario debe verificar el correo electrónico en busca de amenazas con el software adecuado, ya que el remitente no acepta responsabilidad por cualquier daño infligido al ver o manipular el contenido de este correo electrónico.*

*No imprima este correo electrónico a menos que sea necesario. Cada correo electrónico no impreso ayuda al medio ambiente.*

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필요한 경우가 아니면이 이메일을 인쇄하지 마십시오. 인쇄되지 않은 모든 이메일은 환경에 도움이됩니다.

**David Bouffard** <davidtylerbouffard@hotmail.com>

Thu, Mar 10, 2022 at 4:22 PM

To: Todd Hill <toddryangregoryhill@gmail.com>

Cc: "CarolJD@pacbell.net" <CarolJD@pacbell.net>, "Fletcher, Jeremiah J." <j3fletch@asd.org>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Joshua Gillins Oosh\_g19@yahoo.com)" <josh\_g19@yahoo.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, hector pena <hectorpena@ucla.edu>, "jorgenegrete1954@gmail.com" <jorgenegrete1954@gmail.com>

Sent from my iPhone

[Quoted text hidden]

**David Bouffard** <davidtylerbouffard@hotmail.com>

Thu, Mar 10, 2022 at 4:27 PM

To: Todd Hill <toddryangregoryhill@gmail.com>

Cc: "CarolJD@pacbell.net" <CarolJD@pacbell.net>, "Fletcher, Jeremiah J." <j3fletch@asd.org>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Joshua Gillins Oosh\_g19@yahoo.com)" <josh\_g19@yahoo.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, hector pena <hectorpena@ucla.edu>, "jorgenegrete 1954@gmail.com" <jorgenegrete 1954@gmail.com>

Hi Todd-

You owe \$1,866.66 for Spring quarter tuition. You have until midnight on Sunday, March 13, 2022 to pay that amount or you will be blocked from attending classes.

Thank you,

David

Sent from my iPhone

[Quoted text hidden]

**Todd Hill** <toddryangregoryhill@gmail.com>

Thu, Mar 10, 2022 at 4:35 PM

To: David Bouffard <davidtylerbouffard@hotmail.com>

Cc: "CarolJD@pacbell.net" <CarolJD@pacbell.net>, "Fletcher, Jeremiah J." <j3fletch@asd.org>, "Gary Silbiger (gsilbiger1@gmail.com)" <gsilbiger1@gmail.com>, "Joshua Gillins Oosh\_g19@yahoo.com)" <josh\_g19@yahoo.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, hector pena <hectorpena@ucla.edu>, "jorgenegrete1954@gmail.com" <jorgenegrete1954@gmail.com>

David,

That is unfortunate.

This approach appears to necessitate the filing of an injunction, since the timing seems unreasonably short given the outstanding lack of showing from PCL.

Knowingly seeking to collect funds not owed is a crime.

It is clear that PCL has no intention of complying with its legal duties and is willing to pursue criminal means to harass and otherwise interfere with the education it has a duty to provide.

To assist the magistrate:

When exactly did the tuition "come due"?

Why have I only been given 6 days with no prior notice and no support?

Do you enforce these "non-policies" on all of the students?

I look forward to your response.

Todd

[Quoted text hidden]

---

**Todd Hill** <toddryangregoryhill@gmail.com>

Fri, Mar 11, 2022 at 10:54 AM

To: "Wilson, Leah" <leah.t.wilson@calbar.ca.gov>, "Holton, Vanessa" <vanessa.holton@calbar.ca.gov>, "Ching, Audrey"

<audrey.ching@calbar.ca.gov>

Cc: GC@calbar.ca.gov, echemerinsky@law.berkeley.edu

Leah,

Notice of Intent to File for Civil Harassment Restraining Order (PCL); Brief Overview of Issues.

Thanks for your prior assistance.

I reiterate my hopes for an amicable resolution to this matter.

That said, "amicable" is not synonymous with "surrender".

I hope to communicate the following in order to prevent "irreparable" harm to myself and my family who have all made great sacrifices to be subjected to this abhorrent treatment and state of affairs.

My understanding is the following:

1. A warrant was issued to Zoom regarding the video (PC631) issue complained of during the tenure of Christina Gonzalez;
2. I did not receive critical class information timely and I am suffering a myriad of retaliation issues;
3. I requested that PCL file the petition, per the advice I received from Natalie Leonard;
4. My ouster, Hector Pena, does not want to grant the request which was received on Saturday, March 6, 2022.
5. PCL persists in illegal and lawless conduct against its students; now I received 3 day notice to pay or be blocked from class when we all know I have been extorted and they owe me money!
6. CalBar has facilitated this activity through ultra vires and/or negligent acts or failures to act, including defining "students", who must pay a fee to be a "student member" of CalBar as somehow "non-members of the public." In essence, it has "elected" to limit its interpretation of statute in a way that would fail to meet any "plain language or other reasonable standard of meaning."
7. CalBar has made one or more distinction(s) in its regulatory guidelines that allow entities under its authoritative mandate to operate in continuous and flagrant non-compliance with the law. This failure of oversight when CalBar has/d a duty to promulgate, foment, and ensure compliance I assert is "ultra vires" and falls outside the bounds of its authority, since the Legislature in its derivation of the State Bar Act did not cede any of its powers of legislative instantiation.
8. I have reason to believe that, even if the lack of action would otherwise somehow be within the discretionary mandate of CalBar, CalBar failed to use the appropriate process in resolving matters where members of its staff lack appropriate levels of internal oversight.

As I have iterated and presented to you all, I believe that Christina's acts were criminal in nature, done in furtherance of a criminal scheme where the stand for those in her position is "knew or should have known." In this case, the facts clearly indicate she knew.

Now we are left with 2 school graduates who have never passed the Bar, a ghost Registrar, a ghost Dean, and a 4L student in my "current" role and a complicit Board. One might argue that this is the "Enron" of law schools for its overt and abject lawlessness.

And out of the above folks are hiding documents, telling lies, intentionally stonewalling causing emotional distress; although being "blocked from class" might not facially appear as "the threat of violence", what you are robbed of goes far beyond the standard notion of a simply "dignitary harm"; my reaction was visceral and the stress is VERY real.

As I have indicated, any policies or guidelines that are too "gray area" for CalBar to enforce yet allows an institution under its umbrella to operate endlessly and defiantly in direct compliance with the law, that likely has severe disparate impact consequences, and allows CalBar employees to act with impunity and breach core areas of trust likely was not created using the appropriate duty of care or reverence for statute.

I will reach out to the office you referred me to regarding the evaluation of the unit issues.

I still hope for an amicable and less controversial resolution, but I am limited by the behavior and the nature of the parties here.

I respectfully remind the Bar of its obligations re spoliation, and ask that meta data be preserved as well, since there is evidence of document "destruction" and/or loss.

Sincerely,

Todd

[Quoted text hidden]

**Wilson, Leah** <Leah.Wilson@calbar.ca.gov>

Fri, Mar 11, 2022 at 3:10 PM

To: Todd Hill <toddryangregoryhill@gmail.com>, "Holton, Vanessa" <Vanessa.Holton@calbar.ca.gov>, "Ching, Audrey"

<Audrey.Ching@calbar.ca.gov>

Cc: GC <GC@calbar.ca.gov>, "echemerinsky@law.berkeley.edu" <echemerinsky@law.berkeley.edu>

Confirming receipt of your email.

Thank you,

Leah

Leah Wilson

Executive Director, Office of the Executive Director

The State Bar of California | 180 Howard Street | San Francisco, CA 94105

415-538-2257 | [Leah.Wilson@calbar.ca.gov](mailto:Leah.Wilson@calbar.ca.gov)

***Working to protect the public in support of the mission of the State Bar of California.***

Please consider the environment before printing this email.

**From:** Todd Hill <toddryangregoryhill@gmail.com>

**Sent:** Friday, March 11, 2022 10:54 AM

**To:** Wilson, Leah <Leah.Wilson@calbar.ca.gov>; Holton, Vanessa <Vanessa.Holton@calbar.ca.gov>; Ching, Audrey <Audrey.Ching@calbar.ca.gov>

**Cc:** GC <GC@calbar.ca.gov>; echemerinsky@law.berkeley.edu

**Subject:** Fwd: Tuition

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Fri, Mar 11, 2022 at 4:10 PM

To: "Wilson, Leah" <Leah.Wilson@calbar.ca.gov>

Cc: "Ching, Audrey" <Audrey.Ching@calbar.ca.gov>, GC <GC@calbar.ca.gov>, "Holton, Vanessa"

<Vanessa.Holton@calbar.ca.gov>, "echemerinsky@law.berkeley.edu" <echemerinsky@law.berkeley.edu>

Leah,

Thank you.

Todd

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Fri, Nov 4, 2022 at 10:46 AM

Draft To: GC <GC@calbar.ca.gov>

This is a request for assurance that Cal Bar has taken reasonable steps to date to prevent spoliation

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Fri, Nov 4, 2022 at 11:31 AM

To: "Leonard, Natalie" <natalie.leonard@calbar.ca.gov>, "Ching, Audrey" <audrey.ching@calbar.ca.gov>, "Wilson, Leah"

<leah.wilson@calbar.ca.gov>, GC <GC@calbar.ca.gov>, "Davtyan, Ellin" <ellin.davtyan@calbar.ca.gov>, antitrust@ftc.gov,

Administrator Registrar <adминистратор1974@gmail.com>, "Dean, PCL" <dean@peoplescollegeoflaw.edu>

Cc: Ira Spiro <ira@spirolawcorp.com>

A precautionary note: Ira tends to rely on the readers lack of time  
and/or interest in his misrepresentations.

--- Forwarded message -----

From: Todd Hill <toddryangregoryhill@gmail.com>

Date: Thu, Mar 10, 2022 at 4:35 PM

Subject: Re: Tuition

To: David Bouffard <davidtylerbouffard@hotmail.com>

Cc: CarolJD@pacbell.net <CarolJD@pacbell.net>, Fletcher, Jeremiah J.

<j3fletch@lasd.org>, Gary Silbiger (gsilbiger1@gmail.com)

<gsilbiger1@gmail.com>, Joshua Gillins Uosh\_g19@yahoo.com)

<josh\_g19@yahoo.com>, Juan Manuel Sarinana

<sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>,

hector pena <hectorpena@ucla.edu>, jorgenegegrete1954@gmail.com

<jorgenegegrete1954@gmail.com>

[Quoted text hidden]



Todd Hill <toddryangregoryhill@gmail.com>

## Populi and access to classes

3 messages

**David Bouffard** <davidtylerbouffard@hotmail.com>  
To: "toddryangregoryhill@gmail.com" <toddryangregoryhill@gmail.com>  
Cc: "jorgenegrete1954@gmail.com" <jorgenegrete1954@gmail.com>

Mon, Mar 14, 2022 at 5:59 PM

Todd,

The President has instructed me to inform you that he has blocked your access to Populi and the Administration will notify your instructors to not allow you into any class until your tuition has been paid in full.

David

Sent from my iPhone

**Todd Hill** <toddryangregoryhill@gmail.com> Mon, Mar 14, 2022 at 6:14 PM  
To: Cyrus W <whittakercyrus@gmail.com>, David Bouffard <DavidTylerBouffard@hotmail.com>, GC <GC@calbar.ca.gov>, "Joshua Gillins Oosh\_g19@yahoo.com" <josh\_g19@yahoo.com>, Juan Carlos Moran <jcm@attorinemoran.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, Prem Sarin <premantonio1@gmail.com>, Rebecca Hirsch <registrar@peoplescollegeoflaw.edu>, "Rebecca Hirsch (PCLregistrar@peoplescollegeoflaw.edu)" <PCLregistrar@peoplescollegeoflaw.edu>, State Bar of California - Eligibility <eligibility@calbar.ca.gov>, dean@peoplescollegeoflaw.edu, hector pena <jorgenegrete1954@gmail.com>  
Cc: Kevin Clinton <kevinclintonpro@gmail.com>

David,

You are fully aware I do NOT owe ANY moneys to the school.

You know the school owes me money, which is the reason you are unable to supply a legitimate accounting or proof of debt.

Please send my transcripts to the bar; it is expressly school policy not to hold transcripts, especially for a debt you cannot legally support.

You are not in the military where "orders from above" wash away your culpability; bad faith is bad faith, and this is text book.

### You are aware a search warrant was issued?

I will have my additional notice of violation to you this evening.

The injunction will be filed in the morning.

I will communicate to the professors the current nature of this inquiry and allow them to decide how they best see fit to proceed; as licensed practitioners they may wear their responsibilities with gravitas.

At any rate, the retaliation is clear and evident. You, ostensibly treasurer of a law school, have violated not just the law but have shown what a sham the "social justice" approach of our school is.

I respectfully remind you of your duties to avoid spoliation of the records.

Todd

[Quoted text hidden]

--

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*Creo que su seguridad es una alta prioridad. Por lo tanto, he hecho un esfuerzo razonable para asegurarme de que el mensaje no contenga errores ni virus. Desafortunadamente, no se puede garantizar la seguridad total del correo electrónico ya que, a pesar de mis esfuerzos, los datos incluidos en los correos electrónicos podrían estar infectados, interceptados o dañados. Por lo tanto, el destinatario debe verificar el correo electrónico en busca de amenazas con el software adecuado, ya que el remitente no acepta responsabilidad por cualquier daño infligido al ver o manipular el contenido de este correo electrónico.*

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Mail Delivery Subsystem <mailer-daemon@googlemail.com>  
To: toddryangregoryhill@gmail.com

Mon, Mar 14, 2022 at 6:14 PM



## Address not found

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Final-Recipient: rfc822; [premantonio1@gmail.com](mailto:premantonio1@gmail.com)

Action: failed

Status: 5.1.1

Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try 550-5.1.1 double-checking the recipient's email address for typos or

550-5.1.1 unnecessary spaces. Learn more at

550 5.1.1 <https://support.google.com/mail/?p=NoSuchUser> n126-20020a1c2784000000b00389b5871ecfsor227948wmn.17 - gsmtp

Last-Attempt-Date: Mon, 14 Mar 2022 18:14:41 -0700 (PDT)

-- Forwarded message --

From: Todd Hill <toddryangregoryhill@gmail.com>

To: Cyrus W <whittakercyrus@gmail.com>, David Bouffard <DavidTylerBouffard@hotmail.com>, GC <GC@calbar.ca.gov>, "Joshua Gillins Gosh\_g19@yahoo.com)" <josh\_g19@yahoo.com>, Juan Carlos Moran <jcm@attorinemoran.com>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, Prem Sarin <premantonio1@hotmail.com>, Prem Sarin <premantonio1@gmail.com>, Rebecca Hirsch <registrar@peoplescollegeoflaw.edu>, "Rebecca Hirsch (PCLregistrar@peoplescollegeoflaw.edu)" <PCLregistrar@peoplescollegeoflaw.edu>, State Bar of California - Eligibility <eligibility@calbar.ca.gov>, dean@peoplescollegeoflaw.edu, hector pena <jorgenegetre1954@gmail.com>

Cc: Kevin Clinton <kevinclintonpro@gmail.com>

Bcc:

Date: Mon, 14 Mar 2022 18:14:29 -0700

Subject: Re: Populi and access to classes

----- Message truncated -----

EXHIBIT 8, pg. 17 of 17

EXHIBIT 9

**From:** lawschoolregulation  
**To:** Juan Manuel Sarinana; lawschoolregulation  
**Subject:** RE: Demonstrating Compliance with Unaccredited Guideline 5.9/Guideline Change process  
**Date:** Friday, April 29, 2022 3:34:38 PM

---

Thank you for your reply. The State Bar scheme does \*not\* give the same credit for a 10-week quarter as a 15-week semester. Rather, it gives a calculation for quarter units (when it's 10 weeks) and semester units (when it's 15 weeks). You give classes in quarters, but award semester unit credit. You need to switch to quarter unit credits if your schedule is in quarters.

Please advise the law school's next steps.

Thank you,  
The Office of Admissions

---

**From:** Juan Manuel Sarinana <sarinanaesquire@gmail.com>  
**Sent:** Thursday, April 28, 2022 10:57 PM  
**To:** lawschoolregulation <lawschoolregulation@calbar.ca.gov>  
**Subject:** Re: Demonstrating Compliance with Unaccredited Guideline 5.9/Guideline Change process

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Office of Educational Standards,

Here is how PCL explains the question presented as it relates to Guideline 5.9\* and the history behind it. Their statement follows below:

People's College of Law didn't change its calculation of credits or units a couple of years ago.

What PCL did was change first-year classes from semester system to quarter system. That change was voted adopted by the Board at its meeting of March 19, 2018, and went into effect in the 2019-2020 Academic Year.

However, despite that change, PCL kept the same number of credits/units for quarters that PCL had used for years - 2 units for quarters, and it was 3 units for semesters, but of course, semesters were eliminated with this change. Using 3 units for semesters and 2 units for quarters predated PCL's unprecedented election of May 2017. It could be that the number of units/credits PCL gave began before the State Bar started regulating PCL and other law schools, which PCL believes started in 2008.

However, Guideline 5.9 (below) gives the same number of units/credits for 15 weeks in a semester as it does for 10 weeks in a quarter.

We believe that our system makes more sense, giving 2 units for a quarter and 3 for a semester since a semester is 1½ as many weeks as a quarter."

\*Guideline 5.9 Quantitative Academic Requirements.

(A) Fixed-Facility Law Schools.

A fixed-facility law school's curriculum must be offered in semester units or quarter units.

(1) One-semester unit is defined as fifteen {15} hours of classroom instruction. Generally, one hour of instruction per week for fifteen {15} weeks equals one semester unit of credit.

(2) One-quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per week for ten {10} weeks equals one-quarter unit of credit.

Hope you have a great weekend.

Sincerely,

Juan Manuel Sarinana

Dean, People's College of Law

On Tuesday, April 26, 2022, lawschoolregulation <[lawschoolregulation@calbar.ca.gov](mailto:lawschoolregulation@calbar.ca.gov)> wrote:

Dear Dean Sarinana and Registrar Zuniga Nunez:

I am writing to follow up on a question previously posed to the law school last summer to which a response is still needed.

Two students raised a question regarding the method of credit calculation used by Peoples' College of Law for several specific classes.

When asked about this, as to the specific law school classes raised by the students, Peoples College of Law expressed support for its internal calculation, but did not explain why it was not following the formula set forth in unaccredited guideline 5.9 for calculating credits for quarter hour classes. Further follow up to the law school went unanswered.

As a result, the State Bar pulled transcripts from prior students, which appears to show that Previously, the law school conducted the first year in a semester format and subsequent years in quarter formats. Now, for a number of years, the law school has conducted the JD program in quarter hour formats for all four years. It was not possible to review the internships or the full scope of electives.

This email renews the request for the law school to familiarize itself with unaccredited guideline 5.9 and determine whether it is complying with the credit calculation format stated in that guideline and advise the State Bar of status in its progress report or via other method as soon as possible. The law school's response and, if not in alignment with the guideline, adjustment of credit calculation, is required and slated to be presented to the Committee at the next upcoming meeting.

In the meantime, Dean Emeritus Ira Spiro has reached out to the State Bar, regarding a proposed rule or guideline change, perhaps on this topic or another. If a law school is interested to propose

a change, it would be appropriate to send a written proposal with the proposed topic of study or change and rational for the change to [lawschoolregulation@calbar.ca.gov](mailto:lawschoolregulation@calbar.ca.gov) to start the review process.

Thank you,  
Educational Standards, Office of Admissions  
[The State Bar of California](#) | [180 Howard Street](#) | San Francisco, CA 94105  
Phone: 415-538-2120 | Fax: 415-538-2304 | [lawschoolregulation@calbar.ca.gov](mailto:lawschoolregulation@calbar.ca.gov)

***Working to protect the public in support of the mission of the State Bar of California.***

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EXHIBIT 10

## **Exhibit 10 Chronological Timeline of Facts and Allegations**

### **2018–2019: Enrollment and Initial Engagements**

1. Summer 2018: Todd Hill attends a recruitment event for People's College of Law (PCL). This marks Hill's first contact with PCL's administration, initiating his later enrollment.
2. Fall 2019: Todd Hill enrolls as a first-year law student at PCL. This establishes Hill's status as a PCL student and begins his relationship with the PCL Board of Directors and administration, who later become defendants in his legal action.

### **2020: Academic Milestone and Early Compliance Issues**

3. June 2020: Todd Hill passes the First-Year Law Students' Examination (FYLSX). However, PCL provides him with a transcript containing material errors in course unit allocations. PCL then fails to timely submit Hill's FYLSX certification and transcript to the California State Bar as required. This administrative failure violates State Bar rules.

### **2021: Complaints Emerge, Fraudulent Solicitations, and Retaliatory Acts**

4. May 7, 2021: PCL's Board (including Dean Ira Spiro and Board President Christina Gonzalez) holds a fundraiser, publicly promising that "100% of proceeds" will be used for student needs and advancing underserved communities. After the event, Spiro and other board members authorize a misleading 'Thank You' note to donors that appears to misrepresent how the funds will be used.

5. May 28, 2021: Dean Spiro emails Natalie Leonard, a State Bar official, discussing various issues but omitting known problems of incorrect unit awards on student transcripts.
6. June 2021: A routine State Bar inspection finds PCL in substantial non-compliance with accreditation standards. Multiple deficiencies are identified, prompting the need for corrective actions.
7. June 15, 2021: PCL student Nancy Popp submits a formal grievance to the PCL Board, detailing inaccurate grading, lack of governance transparency, and substandard instruction violating State Bar guidelines.
8. June 18, 2021: The State Bar's Committee of Bar Examiners (CBE) reviews a PCL progress report on past inspection recommendations, noting some progress but identifying unresolved issues.
9. July 14, 2021: Dean Ira Spiro resigns as Dean of PCL, effective August 13, 2021, citing uncertainty about his continued role on PCL's Executive Committee.
10. August 2, 2021: Spiro informs the PCL Board that the State Bar instructed him not to retroactively change unit allocations on transcripts without CBE approval.
11. August 3, 2021: Spiro emails Leonard confirming their conversation about PCL's unit-credit issue. Leonard advises against sending a school-wide clarification about PCL's practice of counting quarter-system courses as 2 units instead of 3.
12. October 4–15, 2021: PCL Board Election and Hill's Candidacy: Todd Hill is elected to the Board through a community vote. Peña challenges the legitimacy of Hill's candidacy, prompting a questionable review process.

13. November 14, 2021: Christina Gonzalez resigns as PCL Board President, issuing a letter maligning Todd Hill and blaming him for discord.
14. November 19–21, 2021: The PCL Board finalizes the ouster of Hill and installs new Board members without notifying Hill or providing him an opportunity to contest the decision.
15. November 24, 2021: Viramontes receives a communication from Clinton addressing proposed PCL Student Handbook changes aimed at discouraging complaints to the State Bar. (See Exhibit 7)
16. Late November 2021: PCL’s administration introduces retroactive rules aimed at students who complain, which appears to target Hill’s advocacy efforts.

#### **2022: Denial of Fourth-Year Program, Fraudulent Schemes, and Regulatory Escalation**

17. January 2022: Hill makes a scheduled tuition payment for the spring term. PCL’s student portal remains inaccurate, preventing accurate student status and credit validation. PCL’s administration fails to respond to Hill’s requests for accounting.
18. March 2022: Emails confirm unlawful tuition charges and collection efforts by PCL, including threats of withholding services. (See Exhibit 3)
19. March 2022: Emails confirm ongoing issues with grade uploads and PCL’s continued failure to provide accurate transcripts. (See Exhibit 4)
20. June 7, 2022: Hill formally notifies PCL that the school is failing to provide the mandated fourth-year curriculum necessary for his graduation. PCL’s non-response marks a clear breach of educational duty.

21. June 30, 2022: PCL informs Hill it will not offer any classes or curriculum for his fourth-year study. The refusal is delivered via email and formal letter.
22. July 20, 2022: The California State Bar issues a Notice of Noncompliance to PCL, identifying numerous violations of the Rules for Unaccredited Law Schools.
23. December 2022: The Committee of Bar Examiners places PCL on probation, requiring monthly progress reports to demonstrate compliance improvements.

### **2023: Escalation, Legal Actions, and Continued Obstruction**

24. May 5, 2023: Hill files a Supplemental First Amended Complaint against PCL's Board of Directors alleging fraud, retaliation, and civil rights violations under RICO and other laws.
25. August 2023: PCL issues a partial refund to Hill, but the payment is incomplete and fails to cover the full damages owed.
26. August 18, 2023: The Committee of Bar Examiners directs PCL to conduct a comprehensive transcript analysis for all students and provide proof of compliance.

### **2024: Closure of PCL and Aftermath**

27. May 31, 2024: The California State Bar revokes PCL's charter to operate as a law school due to protracted non-compliance, effectively shutting down the school.